

**EXHIBIT B (contd.)**

**Copy of All Filings with State Court**

D-1-GN-18-001835

NEIL HESLIN and	§	IN DISTRICT COURT OF
SCARLETT LEWIS	§	
	§	TRAVIS COUNTY, TEXAS
VS.	§	
	§	261 <sup>st</sup> DISTRICT COURT
ALEX E. JONES, INFOWARS, LLC,	§	
FREE SPEECH SYSTEMS, LLC, and	§	
OWEN SHROYER	§	

D-1-GN-18-001842

LEONARD POZNER and	§	IN DISTRICT COURT OF
VERONIQUE DE LA ROSA	§	
	§	TRAVIS COUNTY, TEXAS
VS.	§	
	§	345 <sup>th</sup> DISTRICT COURT
ALEX E. JONES, INFOWARS, LLC,	§	
and FREE SPEECH SYSTEMS, LLC	§	

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**PLAINTIFFS' MOTION FOR SANCTIONS REGARDING CORPORATE DEPOSITION**

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THE COURT: If we have a similar experience file a motion again, Mr. Bankston. Because then I'll just -- in fact, then send me the transcript, you can put the new motion on top of it. You don't need to pull out every single excerpt, you can just send me the whole transcript, I'll read the whole transcript and, um, then I'll need a proposed order if this happens again.

(See Ex. 1, January 14, 2022 Transcript, p. 83).

Plaintiffs bring this Motion for Sanctions Regarding Corporate Deposition because this Court's explicit instructions for the deposition were not followed in any respect. Once again, the deposition was totally inadequate with the new representative giving the same types of non-answers as the previous representatives. Pursuant to the Court's instructions, Plaintiffs have provided the transcript, and this Motion will not feature pull-outs of the

testimony. Instead, Plaintiffs will briefly summarize the salient points of this catastrophic failure to follow the Court's instructions.

### **FACTS**

On January 14<sup>th</sup>, this Court once again ordered Defendants to provide corporate testimony after they failed to prepare their latest designee, Daria Karpova. At the hearing, Defendants' counsel Jacquelyn Blott told the Court that she was "relatively certain that it will be more than one person" designated by Defendants for this fifth remedial deposition. (Ex. 1, January 14, 2022 Transcript, p. 85). The Court ordered the deposition to occur within a month, and Ms. Blott stated she would "dedicate all my time to that." (*Id.* at p. 85-86).

Defendants waited two weeks before selecting and preparing any designee. On February 1, 2022, a single designee was selected and informed that she would be testifying. This designee began her preparation that day, and she was scheduled to testify on February 14<sup>th</sup>. The same designee was also selected to testify for the corporate deposition in the *Fontaine* case the following day on February 15<sup>th</sup>. At that point, the designee had 12 remaining days to prepare for 16 distinct topics in two separate corporate depositions.

The choice of designee was certainly odd. Defendants selected Brittany Paz, a Connecticut criminal defense lawyer in her tenth year of practice with no prior connection to the company. Ms. Paz has no special expertise in any of the topic areas, and no connection to these lawsuits except one: Ms. Paz previously worked for several years as a junior associate of Norm Pattis, the attorney representing Defendants in the *Lafferty* case in Connecticut. Ms. Paz was initially offered \$25,000 to act as corporate representative, but she negotiated the amount to \$30,000. This amount was finalized before Ms. Paz ever performed any work.

Ms. Paz's preparation can be summarized as follows:

- She claimed to have spent a bit over 100 hours watching videos, reviewing documents, and interviewing employees. This preparation was split between the 16 topics in the two depositions.
- Ms. Paz did not watch all the videos in the Plaintiffs' petitions, nor did anyone catalog their content for her. She did not review all the documents produced by Defendants.
- To prepare for deposition, neither Ms. Paz nor the company engaged in any additional search for documents beyond what was already produced. None of the company's various communications systems were searched.
- Ms. Paz spent three days interviewing the following InfoWars employees:

Alex Jones	Defendant
Daria Karpova	Sound engineer for the events of the suit.
Rob Dew	Writer/anchor
Kit Daniels	Writer
Adan Salazar	Writer
Paul Watson	Contractor/UK-based editor
Melinda Flores	Bookkeeper
Robert Roe	Outside accountant consultant

Ms. Paz also spoke with two former employees: Michael Zimmerman, a former IT employee, and Nico Aguilar, a former production assistant.

In preparing for deposition, Ms. Paz did not speak or try to speak with any of the following individuals:



Owen Shroyer	Host / Defendant
Tim Fruge	Operations Manager, in charge of evidence preservation
Scott Bronson	Manager of InfoWars Affiliate Relations Department
Jamie White	Editor
Mikael Thalen	Former editor. Kit Daniels testified in <i>Lafferty</i> that Mr. Thalen oversaw fact-checking from 2014-2018.
Buckley Hamman	<p>One of the two most senior people at InfoWars during the Sandy Hook coverage, according to Editor Paul Watson.</p> <p>Mr. Hamman is Alex Jones' cousin.</p> <p>Mr. Hamman is part of several key emails, including the email warning that Jones' sources were "batshit crazy."</p>
Anthony Gucciardi	<p>The other of the two most senior people at InfoWars during the Sandy Hook coverage, according to Paul Watson.</p> <p>Mr. Gucciardi was also part of the "batshit crazy" discussion.</p>
Kurt Nimmo	Former head writer, 2008-2018
Aaron Dykes	Former writer for Sandy Hook coverage
Melissa Melton	Former writer for Sandy Hook coverage
Jakari Jackson	Former on-air-reporter / writer during the Sandy Hook coverage
Darren McBreen	Former editor for Sandy Hook coverage
David Knight	Former anchor who left in 2020, researched Neil Heslin, features heavily in Ms. Paz's notes.

LeAnne McAdoo	Former on-air-reporter / writer who covered Sandy Hook, articles appear in relevant videos
Dan Bidondi	Former on-air-reporter / writer who traveled to Newtown multiple times and harassed local residents
Rob Jacobson	Video editor from 2000-2017, complained about Sandy Hook coverage
Joshua Owens	Video editor circa 2014-2017, complained about Sandy Hook coverage
InfoWars Archivist	Archivist employee described by Mr. Jones on his December 29, 2021 show as a “bloodhound who can find anything.”
“Mr. Love”	The company’s accountant
Steve Pieczenik	InfoWars source for Sandy Hook
Jim Fetzer	InfoWars source for Sandy Hook
Wolfgang Halbig	InfoWars source for Sandy Hook

As shown in the deposition transcript, the company did not follow this Court’s instructions in preparing the designee. (*See* Ex. 2, Deposition of Brittany Paz). Ms. Paz was unable to give adequate testimony on any of the eight topics ordered by the Court.

## ARGUMENT

### **I. Defendants did not Follow the Court’s Instructions in Preparing Ms. Paz.**

#### **A. Ms. Paz was not prepared to discuss the sourcing and research for the videos described in Plaintiffs’ petitions.**

Concerning this topic, the Court gave specific instructions:

They should watch every video in the weeks leading up to the deposition. They should identify for themselves, for the

company, every statement that they believe in those videos has a source and they should make efforts to determine what that source was and they should be able to answer intelligently as to the sources and the efforts they have taken to determine those sources. They need to be able to speak about everything Alex Jones said in any of those videos, about every piece of paper he holds up, every piece of paper he shows on that desk camera. They need to search for every person quoted in each video. And by that I mean they need to search every single thing InfoWars or Free Speech Systems or Alex Jones has in their possession on paper, in email, on a text, on any other communication system or in the mind of any employee or former employee or guest of the show. Anything and everything. And they need to be prepared to identify and describe the role of every employee involved with every video.

(See Ex. 1, January 14, 2022 Transcript, p. 79-80).

Ms. Paz and the company did not even come close to following these instructions. She did not watch every video in the Plaintiffs' petitions, nor did anyone at InfoWars watch all the videos and make information available to her. Ms. Paz claimed that many of the key videos were unavailable to her even though Ms. Kaprova had been shown the same videos by Defendants' counsel for her December 2021 deposition.

Ms. Paz and the company did not identify and make efforts to determine all the sources in the videos. Ms. Paz had not reviewed the relevant "Daily Show Logs" for the videos. Ms. Paz and the company did not search for the individuals quoted in the videos. Ms. Paz and the company did not search any emails, texts, and other communications systems whatsoever. Ms. Paz and the company did not reach out to the former employees involved in its Sandy Hook coverage. Ms. Paz prepared an excel chart of videos she viewed, but many of the videos she devoted time to watching were not in Plaintiffs' petition, with many of them occurring after the suit was filed when Jones was commenting on the lawsuits themselves. (See Ex. 3, Ms. Paz's Chart of Videos). In addition, while this chart contains spaces for listing

the InfoWars' employees who researched the videos and the sources they used, the overwhelming majority of the spaces are empty. (*Id.*). Many of those spaces listed people at InfoWars who Mr. Paz did not speak with. (*Id.*). Sample pages are shown below:

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	"1. Why Nate disappears. 2. people walking in circles. 3. Why did they say they didn't catch anyone in the woods when they did. 4. why was the school closed before then after. 5 why Bloomberg sent an email the day before. 6. why didn't they launch emergency helicopters. 6. Tell us why ambulance is parked for an hour and half."				
	"Tell us why this appears to be phoner than a \$5 bill."				
	AJ- "Copyright claims defeated."				
	AJ- "They'll probably take you out." "That's how they do it now. they kill you and your family."				
	Have documents now that the school never existed.				
	Break				Infowars article: "Six year old child suspended for making gun shape with hand"
	"Bombshell info" breaking today: school suddenly reopened then tore it down. school is filthy."		Halbig		
	AJ "It didn't look like a real school, then you add everything together and it looks like a prop. a doll"				
	"Did they kill real kids? Maybe, maybe not" "Just doesn't add up."				
	Bombshell- subpoenas have been issued.				
	Thinks it will show that school was not in operation. Turned off default training.				

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Don't let paramedics inside school.				
	AJ "So they overrode the default settings? YOU'RE saying Standard OP ignored?"				
	Declared legally dead in 8 mins.				
	Where did the 500 children go that day?				
	Biohazard company to decontaminate school				
	AJ- "Continuing with the 16 points."				
	Civilian working a construction detail less than 2 miles away but stayed at his off duty job for 4 hours. Another female officer left the duty site to go to the shooting but he didn't?				
	"They want me to stop asking these questions. Why?"				
	"SH elementary school had highest level of lead paint and asbestos and PCP."				
	AJ- "bulldozed school now"				
	AJ- "Green screen with Anderson cooper and staged interviews and actors playing parts of multiple people."				
	What is your take? We know they've staged other stuff.				
	Halbig- using supposedly live feed.				
	AJ- about Anderson cooper and out to water shot can see garbage blowing and then blows back like its on a loop."				Cut of video of Anderson Cooper interview
	Halbig- where did this script come from?				
	14:30- AJ says that Bloomberg had his networks ready 2 days before.				Source?
	14:55 AJ says Anderson Cooper was in the CIA, runs the hoaxes at CNN.				Cut to footage of CNN pretending they were in Syria on a green screen.

**B. Ms. Paz was not prepared to discuss the individuals involved in the production of the videos described in Plaintiffs' petitions.**

For this topic, the Court gave the same instructions as the previous topic, which the company did not follow. As a result, Ms. Paz could not testify about the individuals involved in the videos and the roles they played, nor did she take appropriate steps to find out. Ms. Paz brought a two-page document to deposition which had a list of employees for the dates of ten of the twenty-two videos in the Plaintiffs' petitions. (See Ex. 4, List of Employees). It only covered dates from 2013-2015. Some dates only listed a single employee.

1/27/2013	4/9/2013	4/18/2013	3/14/2014	5/13/2014	9/25/2014	12/21/2014	12/29/2014	1/13/2015	2/12/2015
Chris Alatis	Nico Acosta	Nico Acosta	Nico Acosta	Nico Acosta	Nico Acosta	Louis Serrache	Nico Acosta	Nico Acosta	Nico Acosta
Kristi Hightower	Chris Alatis	Chris Alatis	Jon Bowne	Jon Bowne	Joseph Biggs	Joseph Biggs	Joseph Biggs	Joseph Biggs	Joseph Biggs
Sarah Cook	Jon Bowne	Jon Bowne	Sarah Cook	Sarah Cook	Lee Ann Fleischer	Lee Ann Fleischer	Jon Bowne	Jon Bowne	Jon Bowne
Derek Etkauf	Derek Etkauf	Kit Daniels	Kit Daniels	Kit Daniels	Richard Gimes	Richard Gimes	Kit Daniels	Kit Daniels	Kit Daniels
Lee Ann Fleischer	Lee Ann Fleischer	Lee Ann Fleischer	Lee Ann Fleischer	Lee Ann Fleischer	Jakari Jackson	Jakari Jackson	Lee Ann Fleischer	Lee Ann Fleischer	Lee Ann Fleischer
Jakari Jackson	Jakari Jackson	Jakari Jackson	Jakari Jackson	Jakari Jackson	Joseph Jennings	Joseph Jennings	Richard Gimes	Richard Gimes	Richard Gimes
Rob Jacobson	Will Jones	Joseph Jennings	Joseph Jennings	Joseph Jennings	David Knight	David Knight	Jakari Jackson	Jakari Jackson	Jakari Jackson
Christopher Jordan	Christopher Jordan	Christopher Jordan	Christopher Jordan	Christopher Jordan	Travis Knight	Travis Knight	Joseph Jennings	Joseph Jennings	Joseph Jennings
Molly Maroney	David Knight	David Knight	David Knight	David Knight	Darin McIlhenny	Darin McIlhenny	David Knight	David Knight	David Knight
Darin McIlhenny	Molly Maroney	Darin McIlhenny	Darin McIlhenny	Darin McIlhenny	Marcos Morales	Marcos Morales	Travis Knight	Travis Knight	Travis Knight
Kurt Nimmo	Darin McIlhenny	Marcos Morales	Marcos Morales	Marcos Morales	CI Oden	CI Oden	Darin McIlhenny	Darin McIlhenny	Darin McIlhenny
Robert Rieger	Marcos Morales	Kurt Nimmo	Kurt Nimmo	Kurt Nimmo	Adam Salazar	Adam Salazar	Marcos Morales	Marcos Morales	Marcos Morales
Molly Rogers	Kurt Nimmo	Josh Owens	Josh Owens	Josh Owens	CI Oden	CI Oden	CI Oden	CI Oden	CI Oden
Adam Salazar	Robert Rieger	Robert Rieger	Robert Rieger	Robert Rieger	Robert Rieger	Robert Rieger	Ryan Sheridan	Josh Owens	Josh Owens
Heath Speakman	Molly Rogers	Molly Rogers	Molly Rogers	Molly Rogers	Adam Salazar	Adam Salazar	Robert Rieger	Robert Rieger	Robert Rieger
Carter Watkins	Adam Salazar	Adam Salazar	Adam Salazar	Adam Salazar	Louis Serrache	Louis Serrache	Ryan Sheridan	Adam Salazar	Adam Salazar
	Louis Serrache	Louis Serrache	Louis Serrache	Louis Serrache	Mikael Thalen	Mikael Thalen	Mikael Thalen	Louis Serrache	Louis Serrache
	Carter Watkins	Heath Speakman	Heath Speakman	Heath Speakman					
		Carter Watkins	Carter Watkins	Carter Watkins					

Ms. Paz did not know the origin of this document or the meaning of the highlights. Ms. Paz only spoke to three people on this entire list, and she had no information regarding the other employees and former employees or their roles in the videos. Ms. Paz openly admitted she could not address this topic.

**C. Ms. Paz was not prepared to discuss internal editorial discussions regarding InfoWars' coverage of the Sandy Hook shooting.**

For this topic, the Court gave the same instructions as the previous topic, which the company did not follow. As such, Ms. Paz could not testify. In fact, Ms. Paz gave the same answer as the former representative Ms. Karpova, claiming that the company had no

editorial discussions whatsoever. Because Ms. Paz claimed there were no editorial discussions, she claimed that no preparation was even needed on this topic.

**D. Ms. Paz was not prepared to discuss the company's knowledge of the Plaintiffs.**

For this topic, the Court gave the following instructions:

The company's knowledge of the plaintiffs. Clearly the representative who was sent did not even try to determine what the company knew, since she had no knowledge of documents that were provided by the company she was there representing in the discovery in these cases. So, I consider it to be minimum efforts for the corporate representative to review every document produced by the company in this litigation prior to their deposition.

(See Ex. 1, January 14, 2022 Transcript, p. 81).

Ms. Paz did not review every document, nor did the company have individuals review the documents and make information available to her. Ms. Paz had never seen key documents, videos, and communications relating to the Plaintiffs, nor spoken to the individuals involved. Ms. Paz was questioned at length about the Plaintiffs, and she was unable to give meaningful testimony about the company's knowledge or any of the problems raised in Plaintiffs' previous sanctions motion.

**E. Ms. Paz was not prepared to discuss the documents produced by the company in response to Plaintiffs' discovery requests.**

For this topic, the Court gave the same instructions as the previous topic. Yet as noted above, Ms. Paz did not review every document, nor did the company have individuals review documents and make information available to her about their contents or organization. Ms. Paz was also totally unfamiliar with the production process, including where documents were originated or where they were stored.

**F. Ms. Paz was not prepared to discuss the audience reach of the videos described in Plaintiffs' petitions.**

For this topic, the Court gave the same requirements, but also added the following instruction:

The audience reach of the videos described in the plaintiff's petition. If it is the case that Free Speech Systems, InfoWars, and Alex Jones do not track who plays their videos, I know it is the case that they track where the stuff they sell gets sold; and that information will need to be provided so that we can go around in the back to see where these videos were played. Does that make sense? I mean, the videos are Alex Jones talking, Alex Jones selling some stuff. He may not know who plays it because he puts it on the internet and says, play it if you want. Maybe that's true. But he knows who is buying his stuff. And so, we'll need that information to answer the audience reach of these videos.

(See Ex. 1, January 14, 2022 Transcript, p. 82-83).

Ms. Paz had no knowledge of the various ways in which Mr. Jones' show was broadcast. Just like Ms. Karpova, Ms. Paz knew nothing about which or how many radio stations, cable packages, over-the-air television, OTT systems, satellite, shortwave or other mediums by which InfoWars programming is disseminated. She had never heard of GCN, the company's co-defendant in *Lafferty* which distributes InfoWars on various radio stations. Audience data from GCN was featured in Plaintiffs' motion for sanctions.

In the previous corporate deposition, Ms. Karpova testified that she would need to consult with InfoWars' Affiliate Relations Department to answer these questions about audience reach. InfoWars' Affiliate Relations Department and its manager Scott Bronson were discussed in Plaintiffs' sanctions motion and during the oral hearing. Yet Ms. Paz had never even heard of an Affiliate Relations Department or Mr. Bronson.

As a result, Ms. Paz had no knowledge of internal audience figures. She was also unaware that Defendants recently produced a deposition transcript in the *Lafferty* case which references an exhibit containing specific audience figures. That exhibit has never been produced in Texas, and Ms. Paz wrongly believed the company has never utilized such audience figures. Ms. Paz admitted she could testify about the figures cited in the *Lafferty* email. Finally, Ms. Paz testified that she took no specific steps to utilize the company's sales information to try and produce useful conclusions about audience reach.

**G. Ms. Paz was not prepared to discuss efforts made by the company to preserve potential evidence.**

Concerning this topic, the Court gave the following instructions:

Seven, efforts made by the company to preserve potential evidence. Similar. If she shows up again, or I'm sure we'll get a new one because that's the way this works, and that person says, "I don't know," then they will have disregarded the orders I am making today. Your client, Ms. Blott, will have violated the orders I am making today. I do not want, "I don't know," "I'm guessing," "I think," "maybe," or "I infer" to be part of the answer at all...Not, "I think maybe something happened somewhere, I'm new to the company." I don't care if it's their first day with the company. If you designate them, they better have answers.

(See Ex. 1, January 14, 2022 Transcript, p. 81-82).

Ms. Paz did not give unequivocal answers. In the 100-page condensed transcript, Ms. Paz answered 219 times with the phrase "I think," another 92 times with the phrase "I don't think," and 51 times with the phrase "I believe," not to mention ceaseless variations of could, might, may, possibly or potentially.

As it concerns the topic of evidence preservation, Ms. Paz did not know anything about when and what the company did to preserve evidence. Much like Ms. Karpova, she did not know when a litigation hold was issued or how that happened. In addition, Ms. Paz did



not even talk to InfoWars Operations Manager Tim Fruge, who was identified as the individual who coordinated InfoWars' efforts to preserve evidence.

Ms. Paz knew nothing about efforts to preserve or search various communications systems inside InfoWars, such as Rocket.Chat, Slack, Wire, BaseCamp, or Pigeon. Shortly before Ms. Paz's deposition, Defendants produced a deposition transcript from *Lafferty* of InfoWars former head writer Kurt Nimmo being shown a BaseCamp message from a colleague warning about "crisis actors" that was never produced in this case. Ms. Paz confirmed that none of these systems were searched for this deposition, and she had no idea what steps at preservation or search were ever taken.

**F. Ms. Paz was not prepared to discuss the company's business structure and relationship with other parties.**

For this topic, the Court gave the following instructions:

The last is the company's business structure and relationship with other parties. Honestly, the idea that I have to explain what that means to a corporation is again ridiculous. No more answers of, well, I didn't talk to Mr. Jones, I'm not really sure, I'm new, nobody works here, it's just all, I don't know, fairy dust that makes these videos go out. None of that. They know. This company knows. Mr. Bankston gets to know.

(*See* Ex. 1, January 14, 2022 Transcript, p. 83).

Ms. Paz could not answer basic questions about the business structure and the company's relations with other parties. In addition, Defendants recently produced a deposition transcript from the *Lafferty* case which references a company organizational chart which was never produced in Texas, but Ms. Paz testified that no such charts exist. Ms. Paz also could not testify about InfoWars, LLC and whether it conducted business operations relevant to this suit.

This summary only scratches the surface of the deficiencies in Ms. Paz's deposition. A review of the transcript shows that Defendants ignored every instruction given by the Court and that she was unprepared to testify about every single one of the ordered topics.

## **II. The Selection of Ms. Paz was Irrational and Shows Bad Faith.**

Courts have recognized there are occasions where it makes sense to designate someone outside the company as a corporate representative. Perhaps a lawyer who has represented the company for many years could be suitable due to his wealth of knowledge. Sometimes a former employee can be a useful designee when they are well equipped to answer based on their past knowledge. On rare occasions, a company might designate an expert or outside vendor if the specific deposition topic is highly technical.

Yet in this case, there was no rational reason to select Ms. Paz to testify. Ms. Paz indicated she had no special knowledge of the company, no special expertise in news media, no special expertise in corporate finance, and no special expertise in information technology. She had no prior connection to the company and no understanding of any relevant facts prior to February 1, 2022. Defendants selected Ms. Paz to provide a buffer and to obfuscate on InfoWars' behalf.

An identical situation arose in the *Actos* MDL. As described by Judge Rebecca Doherty:

Only one witness was presented and that witness *had no personal or first hand corporate knowledge of any kind* of any of the topics about which he was questioned. Rather, the PSC argues he was, in effect, merely a hired gun brought in by Takeda to provide a buffer and to obfuscate on Takeda's behalf—and this Court, after review of the 30(b)(6) deposition, cannot say the deposition does not support that argument.

*In re Actos (Pioglitazone) Products Liab. Litig.*, No. 6:11-MD-2299, 2014 WL 2872299, at \*8 (W.D. La. June 23, 2014) (emphasis in original). In this case, a review of Ms. Paz's deposition

transcript leads to the same conclusion. Much like in this case, the Takeda representative in *Actos* had only reviewed selected information and talked to limited employees:

Takeda had designated Daniel L. Regard, II, *an electronic discovery consultant who did not and does not work for any Takeda entity*, other than as a consultant, but rather, was retained, it would seem, solely for the purpose(s) of this litigation and to act as Takeda's 30(b)(6) designee. In preparation for the deposition, Mr. Regard – again, who had no personal or first hand corporate knowledge of any kind of any Takeda entity – testified he conducted dozens of employee interviews, went on site visits, and reviewed numerous Takeda documents and policies in preparation for the deposition. However, it is clear from a review of the interviews he conducted that Mr. Regard spoke only to certain and select Takeda employees about certain and select issues related to the subject matter designated for the 30(b)(6) deposition. For example, it is not at all clear that Mr. Regard spoke to many information technology (“IT”) employees at Takeda, and, his deposition reflects, he did not have a strong grasp of Takeda's actual IT procedures and their interplay with litigation hold policies and procedures.

*Id.* at \*9 (emphasis in original). The *Actos* court noted that even for the employees which were interviewed, important subject matters were omitted. *Id.* (“[I]t is clear from the deposition transcript there were a number of important issues related to the litigation holds that Mr. Regard simply did not question Ms. Calahan about.”). Faced with this same situation, the *Actos* court found itself “perplexed” by the selection and preparation of the deponent:

As Mr. Regard had *no personal knowledge or first hand corporate knowledge* concerning these issues himself – having never worked for Takeda other than as a consultant and having only been retained to answer questions at Takeda's 30(b)(6) deposition – the Court is perplexed as to how Mr. Regard could have been expected to provide definitive and comprehensive answers to the many questions specifically ordered by the magistrate judge and, in fact, a careful review of his deposition shows that in large part, he did not.

*Id.* at \*34 (emphasis in original). As in *Actos*, the selection of Ms. Paz made no sense except as a device “to provide a buffer and to obfuscate on [InfoWars’] behalf.” *Id.* at 8.

### **III. The Topics Required More than One Designee.**

Ms. Paz repeatedly testified in both of her depositions that no single person could possibly carry out the preparation required for all of the topics. Plaintiffs agree. The law requires that more than one individual must be designated if more than one is needed to testify fully about the notice’s subject matters. *See In re Fina Oil & Chem. Co.*, No. 13-98-640-CV, 1999 Tex. App. LEXIS 1751, at \*14–15 (Tex. App.—Corpus Christi Mar. 11, 1999, orig. proceeding) (Rule “consistently construed to require that a corporation ‘must not only produce such number of persons as will satisfy the request, but more importantly, prepare them so that they may give complete, knowledgeable, and binding answers on behalf of the corporation.’”) (first quoting *Marker*, 125 F.R.D. at 126 (M.D.N.C. 1989); then quoting *Allstate Tex. Lloyds v. Johnson*, 784 S.W.2d 100, 103 (Tex. App.—Waco 1989, orig. proceeding)); cf. *Ecclesiastes 9:10-11-12, Inc. v. LMC Holding Co.*, 497 F.3d 1135, 1146 (10th Cir. 2007) (“The law is well-settled that corporations have an ‘affirmative duty’ to make available as many persons as necessary to give ‘complete, knowledgeable, and binding answers’ on the corporation’s behalf.”) (quoting *Reilly v. Natwest Mkts. Grp. Inc.*, 181 F.3d 253, 268 (2d Cir. 1999)); *SEC v. Goldstone*, 301 F.R.D. 593, 646-47 (D.N.M. 2014) (same); *Myrdal v. State*, 248 F.R.D. 315, 317 (D.D.C. 2008) (A corporation “is under a duty to designate more than one deponent if it is necessary to do so in order to respond to the relevant areas of inquiry.”).

In this case, no one person could be reasonably capable of testifying to all the topics in both the Fontaine and Sandy Hook deposition notices, especially with 12 days of

preparation beforehand. By sending Ms. Paz, a single designee with no prior knowledge or expertise, Defendants guaranteed that full and adequate preparation would be impossible.

#### **IV. Defendants Failed to Timely Designate and Prepare Ms. Paz.**

When faced with a deposition notice, the rules require an organization to respond a reasonable time *before* the deposition setting forth its designee(s):

In response, the organization named in the notice must - a reasonable time before the deposition - designate one or more individuals to testify on its behalf and set forth, for each individual designated, the matters on which the individual will testify.

Tex. R. Civ. P. 199(b)(1); *see also* 3 Tex. Prac. Guide Pers. Inj. 2d § 8:336, Corporate depositions (“The response must be made a reasonable time before the deposition.”). Here, Defendants did not provide any response or disclose the identity of their designee in the month before the deposition. With two business days remaining before the deposition, Plaintiffs’ counsel asked Defendants to explain why they had not identified their witness. (Ex. 5, February 9, 2022 emails between counsel). As short time later, Defendants’ counsel stated that Brittany Paz had been selected. Defendants’ counsel stated:

FSS is designating her as the corporate representative *now* as FSS has ultimately decided that she meets the requirements as enunciated by Judge Guerra Gamble in her ruling from the bench with respect to what is required of the corporate representative. (*Id.*) (emphasis added).

Even ignoring the eleventh-hour disclosure – which itself is impermissible under the Rules – even Ms. Paz admits that Defendants waited two weeks before telling her to begin her preparations. Under these circumstances, and bearing the burden alone, Ms. Paz was guaranteed to be an ill-prepared and evasive witness.

**V. The Court Should Grant the Remedies Requested by Plaintiffs in their Prior Motion.**

During the prior sanctions hearing, this Court stated, "I am not going to designate facts as established until after this next deposition and then only if I have to, because I think it may come to that..." (Ex. 1, January 14 Hearing, p. 84). The Court also stayed the remaining discovery obligations of the Plaintiffs. Because Defendants failed to comply with the Court's instructions, Plaintiffs now ask the Court to enter those remedies under Rule 215, along with a substantial punitive money sanction that will finally catch the attention of these Defendants. As such, Plaintiffs have prepared an order 1) providing jury instructions for the topics in the order; 2) disallowing any further discovery from Defendants; and 3) ordering punitive sanctions.

**CONCLUSION**

Because Defendants have ignored the Court's instructions and presented yet another unprepared representative, Plaintiffs pray the Court grant their Motion.

Respectfully submitted,

**KASTER LYNCH FARRAR & BALL, LLP**

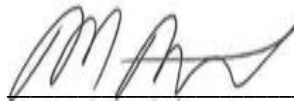


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**CERTIFICATE OF CONFERENCE**

I hereby certify that I conferred with opposing counsel about this Motion, and they are opposed.

A handwritten signature in black ink, appearing to read 'M. Bankston', is written over a horizontal line.

MARK D. BANKSTON

**CERTIFICATE OF SERVICE**

I hereby certify that on February 22, 2022, the forgoing document was served upon all counsel of record via electronic service.

A handwritten signature in black ink, appearing to read 'M. Bankston', is written over a horizontal line.

MARK D. BANKSTON

D-1-GN-18-001835

NEIL HESLIN	§	IN DISTRICT COURT OF
	§	
VS.	§	TRAVIS COUNTY, TEXAS
	§	
ALEX E. JONES, INFOWARS, LLC,	§	261 <sup>st</sup> DISTRICT COURT
FREE SPEECH SYSTEMS, LLC, and	§	
OWEN SHROYER	§	

D-1-GN-18-001842

LEONARD POZNER AND	§	IN DISTRICT COURT OF
VERONIQUE DE LA ROSA	§	
	§	TRAVIS COUNTY, TEXAS
VS.	§	
	§	345 <sup>th</sup> DISTRICT COURT
ALEX E. JONES, INFOWARS, LLC,	§	
and FREE SPEECH SYSTEMS, LLC	§	

D-1-GN-18-006623

SCARLETT LEWIS	§	IN DISTRICT COURT OF
	§	
VS.	§	TRAVIS COUNTY, TEXAS
	§	
ALEX E. JONES, INFOWARS, LLC	§	98 <sup>th</sup> DISTRICT COURT
and FREE SPEECH SYSTEMS, LLC	§	

---

**ORDER ON PLAINTIFFS' MOTION FOR SANCTIONS  
REGARDING CORPORATE DEPOSITION**

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On this day, the Court considered Plaintiffs' Motion for Sanctions Regarding Corporate Deposition. For the reasons below, the Court finds that the Motion should be granted.



## BACKGROUND

Defendants' pattern egregious discovery abuse is well-detailed in the many prior orders of this Court,<sup>1</sup> but a brief history of Plaintiffs' attempts to take a corporate deposition is as follows:

On August 31, 2018, the Court ordered Defendants to appear for depositions in Mr. Heslin's defamation claim (D-1-GN-18-001835). Defendants refused to appear for the depositions or respond to written discovery. After Plaintiff filed a Motion for Sanctions, Defendants initiated an appeal.

On January 25, 2019, this Court ordered Defendants to respond to court-approved discovery requests and appear for depositions in Ms. Lewis' IIED case (D-1-GN-18-006623). Defendants presented Rob Dew as a corporate designee, who was unable to give any testimony. The Court chastised "the failure of the defendants to present an InfoWars corporate representative who has a clue about InfoWars as a corporation," noting that "it was a pretty meaningless deposition." Defendants agreed to stipulate to Plaintiff's petition

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<sup>1</sup> In addition to discovery abuse in these cases, the Court has considered Defendants' consistent pattern of bad faith litigation tactics and discovery abuse in other cases and courts. First, as described in this Court's prior orders, InfoWars has also committed discovery abuse in *Fontaine v. InfoWars, LLC, et al.* (D-1-GN-18-1605), a defamation lawsuit relating to the Stoneman Douglass High School shooting. In that case, InfoWars failed to timely answer written discovery. After InfoWars provided untimely and evasive responses, Mr. Fontaine was forced to bring a motion to compel InfoWars' compliance, for which this Court awarded sanctions and attorney's fees on September 15, 2021. The Court also notes that Defendants have repeatedly violated discovery orders in *Lafferty v. Jones*, a similar lawsuit brought after the instant cases by a different set of Sandy Hook parents in the Superior Court of Connecticut, ultimately resulting in a default judgment on liability several weeks after this Court's entry of default judgment. The Court further notes that Defendants have been sanctioned by the Texas Court of Appeals for bringing a frivolous appeal in Mr. Heslin's case. Finally, as noted in the Court's default judgment order, Mr. Jones has publicly declared that he considers these lawsuits to be a "show trial," showing clear signs that Defendants' discovery violations are the result of bad faith. Mr. Jones' recent deposition confirmed these signs, during which Mr. Jones testified about his indifference to his discovery obligations.

for the purposes of the TCPA motion and voluntarily pay \$8,100 in attorney's fees to avoid sanctions at that time.

Following the events in *Lewis*, the premature appeal in Mr. Heslin's defamation case was dismissed for lack of jurisdiction. Upon remand to this Court in the fall of 2019, InfoWars again refused to respond or appear for deposition. On October 18, 2019, this Court assessed sanctions of \$25,875, while also ruling that Plaintiff's burdens were taken as established for the purposes of the TCPA motion.

On October 18, 2019, this Court ordered Defendants to appear for deposition in Mr. Heslin's IIED case (D-1-GN-18-004651).<sup>2</sup> Again, Rob Dew was produced as the corporate designee. Again, Mr. Dew had not been prepared and was unable to offer any meaningful testimony. On December 20, 2019, the Court assessed sanctions totaling \$100,000 and held the Defendants in contempt for intentionally disobeying the order. At that time, the Court held a default judgment under advisement based on representations by Defendants that discovery would be promptly supplemented during the appellate stay.

All the cases were remanded in June 2021. Defendants had not taken any steps to address the discovery situation during the appeal, and for the next three months following remand, Defendants ignored Plaintiffs' demands for compliance. On September 27, 2019, this Court issued a default judgment on liability and awarded attorney's fees of \$45,925.

### **THE DECEMBER 3, 2021 CORPORATE DEPOSITION**

Following the default judgment, Plaintiffs again sought the Defendants' depositions to secure testimony relevant to the trial on compensatory and punitive damages. Defendants produced Daria Karpova for the deposition. The transcript of Ms. Karpova's deposition

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<sup>2</sup> Subsequently consolidated with D-1-GN-18-001835.

shows that she was not prepared to discuss any of the eight topics for which she had been designated. Her testimony as a whole demonstrated profound disrespect for the discovery process. Ms. Karpova's lack of preparation was flagrant and egregious, especially given the repeated refusal to prepare a designee.

On January 14, 2022, the Court heard argument on Plaintiffs' Motion for Sanctions concerning Ms. Karpova's deposition. The Court granted the Motion, awarded costs, and ordered the Defendants to appear one more time. The Court provided detailed instructions for preparing the designee(s).

### **THE FEBRUARY 2022 CORPORATE DEPOSITION**

On February 14-15, 2022, Defendants presented Brittany Paz as the designee in both the Sandy Hook and Fontaine cases. A review of the deposition transcript shows that Defendants flagrantly disobeyed the Court's order in preparing Ms. Paz. As a result, she was unable to give adequate testimony on any of the topics. Indeed, it appears Ms. Paz was selected to provide a buffer and to obfuscate on InfoWars' behalf. Plaintiffs have now faced five non-appearances at corporate depositions on the issues at the heart of their claims despite every remedial action taken the Court, including the severe sanction of default and over \$200,000 in cumulative attorney's fees.

### **FINDINGS**

. The Court finds that, once again, Defendants have intentionally thwarted the legitimate discovery process in these cases. There is no other way to interpret the refusal to prepare its designee(s) as anything but obstruction of the highest order. The egregiousness and repetitiveness of Defendants' obstruction exhibits a total disregard for and disrespect of the integrity of this Court and our judicial system. Plaintiffs' discovery of facts necessary to

properly present their claim for damages has been irreparably prejudiced in virtually all respects. Absent severe action from this Court, Defendants will ultimately profit from their sabotage of the discovery process.

The Court therefore ORDERS that:

1. Pursuant to Rule 215(b)(1), the Court disallows any further discovery by Defendants. Any obligation of the Plaintiffs to respond to any pending discovery is terminated.

2. Pursuant to Rule 215(b)(2), the Court orders that Defendants shall pay all of the expenses of discovery and taxable court costs in these lawsuits. Plaintiffs shall submit evidence setting forth any court costs or attorney's fees relating to discovery or discovery motions, excepting those costs or attorney's fees which were already awarded in any prior order of the Court.

3. Pursuant to Rule 215(b)(3), the Court orders that designated facts shall be taken to be established for the purposes of the action. Specifically, the jury will be instructed that any factual dispute relating to the following topics shall be taken as established in favor the Plaintiffs:

- Sourcing and research for the videos described in Plaintiffs' petitions.
- Individuals involved in the production of the videos described in Plaintiffs' petitions.
- Internal editorial discussions regarding InfoWars' coverage of the Sandy Hook Elementary School shooting.
- The company's knowledge of the Plaintiffs.
- The audience reach of the videos described in Plaintiffs' petitions.
- The documents produced by the company in response to Plaintiffs' discovery requests.
- Efforts made by the company to preserve potential evidence.
- The company's business structure and relationship with other parties.

4. The Court orders that Defendants shall pay additional punitive monetary sanctions in the amount of \$1,000,000. The Court finds that there is a direct relationship between additional monetary sanctions and the egregiousness and repetitiveness of Defendants' obstruction. Defendants' pattern of discovery abuse is a truly exceptional case and exemplifies a course of misconduct which must be deterred lest future litigants pursue the same path. Given the outrageous nature of the misconduct, the total failure of prior sanctions, and the massive prejudice to Plaintiffs' claims, the Court finds that additional monetary sanctions are appropriate, just, and not excessive. Defendant shall pay this sanction within 30 days of this Order.

Dated \_\_\_\_\_, 2022.

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Hon. Maya Guerra Gamble

REPORTER'S RECORD	
VOLUME 1 OF 1 VOLUME	
1	
2	MARCEL FONTAINE, ) IN THE DISTRICT COURT
3	Plaintiff ) TRAVIS COUNTY, TEXAS
4	VS. ) 459TH JUDICIAL DISTRICT
5	ALEX E. JONES, INFOWARS, ) TRIAL COURT CAUSE NO.
6	LLC, ET AL., ) D-1-GN-18-001605
7	Defendants )
8	NEIL HESLIN, ) IN THE DISTRICT COURT
9	Plaintiff ) TRAVIS COUNTY, TEXAS
10	VS. ) 459TH JUDICIAL DISTRICT
11	ALEX E. JONES, INFOWARS, ) TRIAL COURT CAUSE NO.
12	LLC, ET AL., ) D-1-GN-18-001835 AND
13	Defendant ) D-1-GN-19-004651
14	LEONARD POZNER AND ) IN THE DISTRICT COURT
15	VERONIQUE DE LA ROSA, ) TRAVIS COUNTY, TEXAS
16	Plaintiff ) 459TH JUDICIAL DISTRICT
17	VS. ) TRIAL COURT CAUSE NOS.
18	ALEX E. JONES, INFOWARS, ) D-1-GN-18-001842
19	LLC, ET AL., ) DEFENDANTS
20	SCARLETT LEWIS, ) IN THE DISTRICT COURT
21	Plaintiff ) TRAVIS COUNTY, TEXAS
22	VS. ) 459TH JUDICIAL DISTRICT
23	ALEX E. JONES, INFOWARS, ) TRIAL COURT CAUSE NO.
24	LLC, ET AL., ) D-1-GN-18-006623
25	DEFENDANTS )
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MOTION FOR SANCTIONS; MOTION TO COMPEL	

1 hurt their case. Or some language to that effect. I  
2 just don't know that we're there today on these issues  
3 after one shameful corporate rep. deposition on  
4 damages.

5 And so my, um, you know, I would really  
6 like to have one corporate deposition where the witness  
7 actually prepares, and by that I mean, um, let's see if  
8 I can find the list of the seven topics.

9 Where are they easy for me to find. Oh,  
10 here we go. Actually I have eight topics, by the way,  
11 in the motion, but today you only mentioned seven, so.

12 MR. BANKSTON: I believe I left one out,  
13 Your Honor, you're right about that.

14 THE COURT: Okay. So, sourcing and  
15 research for the videos described in Plaintiff's  
16 petition. This is not, what I'm about to describe, the  
17 universe of preparation that a corporate deposition  
18 should do. What I'm about to describe is the minimum  
19 preparation a corporate deposition should do to respond  
20 to that topic.

21 They should watch every video in the  
22 weeks leading up to the deposition. They should  
23 identify for themselves, for the company, every  
24 statement that they believe in those videos has a  
25 source and they should make efforts to determine what

1 that source was and they should be able to answer  
2 intelligently as to the sources and the efforts they  
3 have taken to determine those sources.

4 They need to be able to speak about  
5 everything Alex Jones said in any of those videos,  
6 about every piece of paper he holds up, every piece of  
7 paper he shows on that desk camera. They need to  
8 search for every person quoted in each video. And by  
9 that I mean they need to search every single thing  
10 InfoWars or Free Speech Systems or Alex Jones has in  
11 their possession on paper, in email, on a text, on any  
12 other communication system or in the mind of any  
13 employee or former employee or guest of the show.  
14 Anything and everything. And they need to be prepared  
15 to identify and describe the role of every employee  
16 involved with every video.

17 And if they are going to show up and say,  
18 we don't keep records on these things, then they need  
19 to show up and be definitive in every response. No  
20 more guessing, assuming, or thinking. They need to  
21 know. Because if the answer is Free Speech Systems  
22 does not care who the source is so we don't -- we don't  
23 check them, we don't write them down, we don't talk  
24 about them and we don't keep a record of them, then the  
25 jury needs to hear that.



1 I think I've covered the second one and  
2 the third one in that description of the minimum  
3 required preparation for the next corporate  
4 representative deposition.

5 The company's knowledge of the  
6 plaintiffs. Clearly the representative who was sent  
7 did not even try to determine what the company knew,  
8 since she had no knowledge of documents that were  
9 provided by the company she was there representing in  
10 the discovery in these cases. So, I consider it to be  
11 minimum efforts for the corporate representative to  
12 review every document produced by the company in this  
13 litigation prior to their deposition. That covers  
14 request or topic five. No, let's see. Six, as well.

15 Seven, efforts made by the company to  
16 preserve potential evidence. Similar. If she shows up  
17 again, or I'm sure we'll get a new one because that's  
18 the way this works, and that person says, I don't know,  
19 then they will have disregarded the orders I am making  
20 today. Your client, Miss Blott, will have violated the  
21 orders I am making today. I do not want, "I don't  
22 know," "I'm guessing," "I think," "maybe," or "I infer"  
23 to be part of the answer at all. Any answer by a  
24 corporate representative designated by the corporation.  
25 You choose, we don't. Mr. Bankston doesn't choose, the

1 court doesn't choose. You choose who is going to  
2 represent the company at this deposition.

3 So, if the answer is, we destroy  
4 everything as fast as we can, then I want them to come  
5 and say that. And if the answer is, we don't care  
6 where it comes from so we don't ever create a record,  
7 they need to say that in that way.

8 MS. BLOTT: Understood.

9 THE COURT: Not, "I think maybe something  
10 happened somewhere, I'm new to the company." I don't  
11 care if it's their first day with the company. If you  
12 designate them, they better have answers.

13 Number, let's see, number five, the  
14 audience reach of the videos described in the  
15 plaintiff's petition. If it is the case that Free  
16 Speech Systems, InfoWars, and Alex Jones do not track  
17 who plays their videos, I know it is the case that they  
18 track where the stuff they sell gets sold; and that  
19 information will need to be provided so that we can go  
20 around in the back to see where these videos were  
21 played. Does that make sense?

22 I mean, the videos are Alex Jones  
23 talking, Alex Jones selling some stuff. He may not  
24 know who plays it because he puts it on the internet  
25 and says, play it if you want. Maybe that's true. But

1 he knows who is buying his stuff. And so, we'll need  
2 that information to answer the audience reach of these  
3 videos.

4 The last is the company's business  
5 structure in relationship with other parties.  
6 Honestly, the idea that I have to explain what that  
7 means to a corporation is again ridiculous. No more  
8 answers of, well, I didn't talk to Mr. Jones, I'm not  
9 really sure, I'm new, nobody works here, it's just all,  
10 I don't know, fairy dust that makes these videos go  
11 out. None of that. They know. This company knows.  
12 Mr. Bankston gets to know.

13 Then if we have a similar experience file  
14 a motion again, Mr. Bankston. Because then I'll  
15 just -- in fact, then send me the transcript, you can  
16 put the new motion on top of it. You don't need to  
17 pull out every single excerpt, you can just send me the  
18 whole transcript, I'll read the whole transcript and,  
19 um, then I'll need a proposed order if this happens  
20 again.

21 So, um, essentially the motion is  
22 granted. And all the costs for this second deposition  
23 are to be borne by the defendant for the plaintiff's  
24 side. I am not going to designate facts as established  
25 until after this next deposition and then only if I

1 have to, because I think it may come to that, but  
2 that's not what anybody who believes in our legal  
3 system wants.

4 Now, I'm confident that there are people  
5 who don't want our legal system to work and will be  
6 happy to have me forced into deciding almost everything  
7 about this case, but that's not what I want. I want it  
8 to work, but it only works if discovery works. And  
9 what I have seen so far is literal years of blatant  
10 discovery abuse and intentional discovery abuse, and  
11 I'm tired of that.

12 Um, Mr. Bankston does not need to respond  
13 to any discovery until after this corporate deposition  
14 is taken again and, um, until at least -- a minimum of  
15 two weeks after the deposition. And if he files  
16 another motion along the lines of this one, then the  
17 stay will continue. So, it's essentially his  
18 responses -- the deadlines for Mr. Bankston's responses  
19 to any discovery requests are stayed until further  
20 order of the court.

21 Anything else?

22 MR. BANKSTON: That's it from the  
23 plaintiffs, Your Honor.

24 THE COURT: I'll ask you to prepare an  
25 order for me, Mr. Bankston, send it to Miss Blott.

1                   Mr. Reeves, are you even still counsel on  
2 the Sandy Hook cases?

3                   MR. REEVES: I am, Your Honor.  
4 Miss Blott is lead counsel but I am still counsel in  
5 the cases, Your Honor.

6                   THE COURT: All right. And you're the  
7 only attorney on the Fontaine case now.

8                   MR. REEVES: That's correct, Your Honor.

9                   THE COURT: Okay.

10                  MS. BLOTT: Your Honor, um, may I ask,  
11 just for purposes of my scheduling, how soon or what  
12 period of time will have elapsed before this deposition  
13 of the corporate representative takes place? I want to  
14 have everyone prepared to fully respond.

15                  THE COURT: Do you know who will be  
16 designated or if there will be more than one person  
17 designated to respond to these topics?

18                  MS. BLOTT: I will have the answer to  
19 that by the end of today, and I am relatively certain  
20 that it will be more than one person.

21                  THE COURT: All right. Then I'm going to  
22 leave it to you and Mr. Bankston to attempt to schedule  
23 those depositions. I think within a month. Does that  
24 seem fair to you, Miss Blott and Mr. Bankston?

25                  MS. BLOTT: I will dedicate all my time

1 to that, Your Honor.

2 THE COURT: All right. I don't think  
3 we're going to trial on March 28th but I could be  
4 proven wrong. Do we want to leave that trial setting  
5 or do we want to -- what do we want to do? I'm -- I  
6 think it's important to have trial settings. If the  
7 deadlines roll from trial settings, the pressure is put  
8 on with them.

9 I'll be honest, I don't know that I want  
10 to have this Voir Dire on Zoom. Um.

11 I don't know how much the two of you --  
12 or the three of you, sorry, Mr. Reeves, have thought  
13 about numbers for a panel. Um. I'm expecting it to be  
14 a larger-than-normal panel request, I just don't know  
15 how much larger. Um. And I just don't know -- I don't  
16 know exactly what's going to happen with this Voir  
17 Dire. But I have done five or six virtual jury trials,  
18 I've got another one in a week and a half. Or in week,  
19 rather.

20 We do virtual Voir Dire. We did it.  
21 It's real hard. I mean it's not hard in the sense that  
22 it doesn't work, it totally works. It's exhausting,  
23 and that's coming from me. I spend eight hours a day  
24 on Zoom, have for almost two years now, so I'm used to  
25 Zoom. It's exhausting for the jurors; it's exhausting

D-1-GN-18-001835

NEIL HESLIN

VS.

ALEX E. JONES, INFOWARS,  
LLC, FREE SPEECH SYSTEMS,  
LLC, and OWEN SHROYER

)  
) IN DISTRICT COURT OF  
)  
) TRAVIS COUNTY, TEXAS  
)  
) 261ST DISTRICT COURT  
)

D-1-GN-18-001842

LEONARD POZNER AND  
VERNONIQUE DE LA ROSA

VS.

ALEX E. JONES, INFOWARS,  
LLC, and FREE SPEECH  
SYSTEMS, LLC

)  
)  
) IN DISTRICT COURT OF  
)  
) TRAVIS COUNTY, TEXAS  
)  
) 345TH DISTRICT COURT  
)

D-1-GN-18-006623

SCARLETT LEWIS

VS.

ALEX E. JONES, INFOWARS,  
LLC, and FREE SPEECH  
SYSTEMS, LLC

)  
) IN DISTRICT COURT OF  
)  
) TRAVIS COUNTY, TEXAS  
)  
) 98TH DISTRICT COURT  
)

Paz, Brittany

of 211  
02-14-2022

<p>2</p> <p>1 *****</p> <p>2</p> <p>3 VIDEO DEPOSITION OF</p> <p>4 BRITTANY PAZ</p> <p>5 FEBRUARY 14, 2022</p> <p>6 *****</p> <p>7</p> <p>8 VIDEO DEPOSITION OF BRITTANY PAZ, produced as a</p> <p>9 Witness at the instance of the PLAINTIFFS and duly</p> <p>10 sworn, was taken in the above-styled and numbered cause</p> <p>11 on FEBRUARY 14, 2022, from 9:06 a.m. to 5:25 p.m.,</p> <p>12 before Logan Kislingbury, Texas CSR, RPR, in and for</p> <p>13 the State of Texas, reported by machine shorthand, at</p> <p>14 the Law Offices of Kirker Davis, LLP, 8310-1 N. Capital</p> <p>15 of Texas Hwy #350, Austin, Texas, pursuant to the Texas</p> <p>16 Rules of Civil Procedure.</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>4</p> <p>1 INDEX</p> <p>PAGE</p> <p>2 Appearances..... 3</p> <p>3 BRITTANY PAZ</p> <p>4 EXAMINATION BY MR. BANKSTON..... 5</p> <p>5 Changes and Signature..... 402</p> <p>6 Reporter's Certificate..... 405</p> <p>7 Reporter's Further Certification..... 407</p> <p>8 EXHIBITS</p> <p>9 NO. DESCRIPTION PAGE</p> <p>10 Exhibit 1 David Knight E-mail..... 72</p> <p>11 Exhibit 2 David Knight E-mail..... 73</p> <p>12 Exhibit 3 Photos..... 93</p> <p>13 Exhibit 4 Article..... 113</p> <p>14 Exhibit 5 Show Log..... 131</p> <p>15 Exhibit 6 Employee Records..... 136</p> <p>16 Exhibit 7 E-mail..... 167</p> <p>17 Exhibit 8 Research Binder..... 212</p> <p>18 Exhibit 9 Heslin Original Petition..... 216</p> <p>19 Exhibit 10 Video Screenshot..... 257</p> <p>20 Exhibit 11 David Jones E-mail..... 345</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>3</p> <p>1 A P P E A R A N C E S</p> <p>2 FOR THE PLAINTIFFS:</p> <p>3 Mr. Mark D. Bankston</p> <p>4 Kaster, Lynch, Farrar &amp; Ball, LLP</p> <p>5 1117 Herkimer</p> <p>6 Houston, Texas 77008</p> <p>7 T: 713-221-8300</p> <p>8 mark@fbtrial.com</p> <p>9</p> <p>10 Mr. William R. Ogden</p> <p>11 Kaster, Lynch, Farrar &amp; Ball, LLP</p> <p>12 1117 Herkimer</p> <p>13 Houston, Texas 77008</p> <p>14 T: 713-221-8300</p> <p>15 bill@fbtrial.com</p> <p>16</p> <p>17 FOR THE DEFENDANTS:</p> <p>18 Ms. Jacquelyn Blott</p> <p>19 Law Offices of Jacquelyn W. Blott</p> <p>20 100 University Blvd., Suite 225 #251</p> <p>21 Round Rock, Texas 78665</p> <p>22 T: 512-639-9904</p> <p>23 jblott@jblottlaw.com</p> <p>24</p> <p>25 ALSO PRESENT:</p> <p>Mr. Tim Bishop, Videographer</p>	<p>5</p> <p>1 BRITTANY PAZ,</p> <p>2 having first been duly sworn, testified as follows:</p> <p>3 THE VIDEOGRAPHER: This is the</p> <p>4 deposition of Brittany Paz. The date is February 14,</p> <p>5 2022 and the time is 9:06. May swear in the witness.</p> <p>6 MS. BLOTT: And before we get started,</p> <p>7 I'd like the record to reflect that I'm handing</p> <p>8 Mr. Bankston a check which represents the amount of the</p> <p>9 sanctions in the amount of 19,000-plus dollars, and</p> <p>10 also that the deposition is being taken pursuant to the</p> <p>11 protective orders entered in these causes of action.</p> <p>12 EXAMINATION</p> <p>13 QUESTIONS BY MR. BANKSTON:</p> <p>14 Q. All right. Ma'am, can you tell us your name.</p> <p>15 A. Sure. My name is Brittany Paz, P-A-Z.</p> <p>16 Q. You are not an employee of Mr. Jones or Free</p> <p>17 Speech Systems?</p> <p>18 A. No, I was contracted to be their corporate</p> <p>19 representative in --</p> <p>20 Q. You've --</p> <p>21 A. -- connection with these depositions.</p> <p>22 Q. Excuse me, sorry.</p> <p>23 A. That's okay.</p> <p>24 Q. You've never been an employee of Mr. Jones or</p> <p>25 Free Speech Systems?</p>



Paz, Brittany

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<p>6</p> <p>1 A. I am currently contracted. But am I on the</p> <p>2 payroll? No, I've never been an employee.</p> <p>3 Q. All right. You understand the difference</p> <p>4 when I say an employee versus a contractor; right?</p> <p>5 A. Yes.</p> <p>6 Q. You've never been an employee?</p> <p>7 A. No.</p> <p>8 Q. Okay. You're an attorney; right?</p> <p>9 A. Yes.</p> <p>10 Q. You primarily practice criminal defense in</p> <p>11 Connecticut?</p> <p>12 A. I do.</p> <p>13 Q. You represent any of the defendants as an</p> <p>14 attorney?</p> <p>15 A. No.</p> <p>16 Q. Have you ever represented any of the</p> <p>17 defendants as an attorney?</p> <p>18 A. No.</p> <p>19 Q. Mr. Jones' company decided to hire to you to</p> <p>20 testify as if you were the company itself; correct?</p> <p>21 A. Yes.</p> <p>22 Q. When were you selected to act as Free Speech</p> <p>23 Systems' corporate representative?</p> <p>24 A. I think that I was officially hired the last</p> <p>25 week in -- I'm sorry, excuse me. The last week in</p>	<p>8</p> <p>1 Q. Is February -- I'm sorry. January 31st,</p> <p>2 February 1st, that time period --</p> <p>3 A. That's right.</p> <p>4 Q. -- is that when you began your preparation?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. Prior to that time, you had no</p> <p>7 meaningful knowledge regarding any of the topics you're</p> <p>8 here to testify about?</p> <p>9 A. No.</p> <p>10 Q. So everything you're going to testify about</p> <p>11 here today is because someone either told it to you or</p> <p>12 because you read it in a document; right?</p> <p>13 A. Or watched videos, yes.</p> <p>14 Q. Okay. Or came out of a video?</p> <p>15 A. Yes.</p> <p>16 Q. For this deposition, because this is how</p> <p>17 we've been talking about it in discovery, I want you to</p> <p>18 conceptualize a document as not just written things.</p> <p>19 Okay? And I'd like for our discussion for you to</p> <p>20 conceptualize it as any generally representational</p> <p>21 tangible thing; right?</p> <p>22 So videos, any sort of notes, handwritten</p> <p>23 notes, anything. So not just typewritten documents.</p> <p>24 And so when I say documents, I want you to think about</p> <p>25 the universe of things that you may have drawn</p>
<p>7</p> <p>1 January, first week in February. So January 31st,</p> <p>2 February 1stish. That week. It's been about two</p> <p>3 weeks.</p> <p>4 Q. When you say officially -- and let me back</p> <p>5 up. You understand that there was a designation filed</p> <p>6 designating you as the corporate representative? And I</p> <p>7 think that was last week, maybe Wednesday. Are you</p> <p>8 aware of that?</p> <p>9 A. I don't know when it was filed.</p> <p>10 Q. Okay.</p> <p>11 A. I didn't file it.</p> <p>12 Q. As far as an official selection, that was</p> <p>13 done well before that?</p> <p>14 A. I don't -- I wouldn't say well before that,</p> <p>15 but it was done before that if it was filed last week.</p> <p>16 Q. Right. So a few weeks before that, at least?</p> <p>17 A. Not a few weeks. I've only been the</p> <p>18 corporate rep for two weeks. I think as of today, it's</p> <p>19 been two weeks.</p> <p>20 Q. Okay. You've had two weeks. Okay. Yeah,</p> <p>21 that makes sense because you said January 31st,</p> <p>22 February 1st.</p> <p>23 A. I think that was a Monday, January 31st. So</p> <p>24 that probably was the day when everything got</p> <p>25 finalized.</p>	<p>9</p> <p>1 information from. Does that make sense?</p> <p>2 A. Sure.</p> <p>3 Q. Okay. You have any special expertise or</p> <p>4 credentials in news media or journalism?</p> <p>5 A. No.</p> <p>6 Q. Do you have any special expertise or</p> <p>7 credentials in corporate finance?</p> <p>8 A. No.</p> <p>9 Q. Do you have any special expertise or</p> <p>10 credentials concerning the practices and protocols in</p> <p>11 information technology?</p> <p>12 A. No.</p> <p>13 Q. Okay. I've -- so I've had depositions</p> <p>14 before. And I think as an attorney, you're familiar</p> <p>15 with what a deposition is?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. I've had corporate representative</p> <p>18 depositions before where sometimes I've had an attorney</p> <p>19 who's represented the company for a long time, so</p> <p>20 they're -- have a lot of knowledge. Or I'll have a</p> <p>21 former employee who no longer works for the company</p> <p>22 come testify because that person has a lot of</p> <p>23 knowledge.</p> <p>24 Or I might have an expert in a certain field</p> <p>25 that that -- that that corporate representative is</p>

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<p style="text-align: right;">10</p> <p>1 supposed to testify and they come in to testify about 2 it. So for those areas, I'm usually pretty 3 understanding why the person is here. For you, what I 4 want to ask you is I'm just trying to figure out how 5 you got selected. 6 And is it just that you're an attorney that 7 Norm Pattis knows, or do you have some sort of special 8 expertise outside of criminal law that makes you 9 well-suited for this deposition? 10 A. I think the reason why I was selected was 11 that there needed to be a person to represent the 12 company who had a broad knowledge of the topics that 13 are listed in the deposition notice. I think you've 14 previously deposed a couple of people that did not have 15 that knowledge. 16 The reason for that being that the company is 17 just not structured that way with one person having 18 singular knowledge about everything in the company. 19 And so I think they needed somebody who had the time 20 and ability to familiarize themselves with that 21 information and that was me. 22 Q. Okay. And when you said there was nobody 23 they were looking at to select for this deposition who 24 possessed that broad knowledge, you don't possess it 25 either; correct? Or did not, at least as of February</p>	<p style="text-align: right;">12</p> <p>1 Q. Okay. And that number was negotiated and 2 finalized before you did any work? 3 A. Yes. 4 Q. Okay. Have Alex Jones or the company -- have 5 -- have Alex Jones or any company related to Alex Jones 6 paid you for anything else? 7 A. Other than my testimony for this deposition? 8 Q. Uh-huh. 9 A. No. 10 Q. Do they plan to? 11 A. I think I may be representing the company up 12 in Connecticut for the corporate rep deposition. I 13 believe that's going to be sometime in March. But 14 aside from that, no. 15 Q. Okay. Now, you understand you're a fact 16 witness; right? 17 A. Yes. 18 Q. You understand that payments to such 19 witnesses must be carefully circumscribed? Do you know 20 what I mean by that? 21 A. Can you -- 22 Q. Sure. Circumscribe means to do an action 23 carefully to ensure that it fits in with relevant 24 rules, regulations, and standards. 25 A. Okay.</p>
<p style="text-align: right;">11</p> <p>1 1st? 2 A. I didn't as of February 1st, no. But as I 3 sit here today, I believe I do. 4 Q. Okay. How much money total will you be paid 5 in connection with being Info Wars' corporate 6 representative in this case? 7 A. I've already been paid, but my fee was 8 \$30,000 plus costs. 9 Q. Okay. How did you arrive at that figure? 10 A. That was a internal discussion, just 11 negotiation between myself and the company. 12 Q. When you say negotiation, can you explain 13 that? Did you offer a figure and they counter offered? 14 How did that work? 15 A. No. I think I was offered a figure to start 16 and then we went from there. 17 Q. What do you mean, you went from there? What 18 does that mean? 19 A. I mean there was a starting number -- 20 Q. Okay. 21 A. -- as any negotiations go, and -- 22 Q. Can you tell me what that starting number 23 was? 24 A. I think the number was 25. And then I just 25 negotiated a little bit higher, 30.</p>	<p style="text-align: right;">13</p> <p>1 Q. You understand that payments to you must be 2 carefully circumscribed; right? 3 A. Sure. 4 Q. Okay. You understand you have professional 5 responsibilities as an attorney that may affect how 6 much you can and cannot be paid for fact testimony; 7 right? 8 A. I don't think that I'm acting here in a 9 capacity as an attorney. So I don't know that I would 10 agree with that. 11 Q. So let's put it this way. In other words, 12 because you're not representing anybody, you just 13 happen to be an attorney -- 14 A. Yes. 15 Q. -- you don't think you have the same 16 professional responsibilities you would have in your 17 attorney work as you do sitting in that chair right 18 now? 19 A. I don't have certain -- I don't have certain 20 ethical responsibilities to the client. I think my 21 only -- my only real obligation is to testify 22 accurately and truthfully, as any witness. 23 Q. Okay. Can you tell me everyone you talked to 24 for this deposition to prepare. 25 MS. BLOTT: I'm going to object to the</p>

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<p style="text-align: right;">14</p> <p>1 extent that it's asking you to identify attorneys who 2 are retained by any of the defendants. 3 Go ahead. 4 Q. (BY MR. BANKSTON) You can answer. 5 A. Sure. So I spoke to numerous employees of 6 Free Speech. I spoke to Mr. Jones. I spoke to 7 Melinda, I believe her last name is Flores. I spoke to 8 Mr. Daniels, he goes by Kit. I spoke to Adan Salazar. 9 I spoke to Bob Coe. I think he's a consultant with 10 the -- with the company. 11 I spoke to Daria Karpova. Who else did I 12 speak to? I spoke to a lot of people. I feel like I'm 13 missing somebody. Oh, I did speak to Mr. Watson over 14 in London via Zoom. 15 Q. Okay. 16 A. I spoke to Rob Dew via Zoom also because he 17 wasn't available while I was here. And I think that 18 might be it. Oh, no, no, I'm sorry. I also spoke to 19 Nico Aguilar on the phone. That might be it. 20 Q. Okay. Now, you have listed here in addition 21 to Mr. Jones -- 22 A. Uh-huh. 23 Q. -- numerous employees. 24 A. Yes. 25 Q. Or former employees, in the case of one. And</p>	<p style="text-align: right;">16</p> <p>1 Q. Okay. Well, I've seen, like, a UCC financing 2 statement with his accounting company listed on it. 3 Have you seen that? 4 A. Maybe. 5 Q. Okay. So maybe he is the company's 6 accountant; right? 7 A. I don't know. I don't think he's the 8 company's accountant. I think there's a Mr. Love -- 9 Love. He's the company's accountant. 10 Q. Okay. So you don't know why Rob Roe's name 11 appears on the financing statements? 12 A. I don't know why that would be. But I don't 13 think he's the company's accountant. 14 Q. Okay. And did you talk to the company's 15 accountant? 16 A. I did not speak to Mr. Love, no. 17 Q. Okay. To prepare for this deposition, did 18 you review every document produced in this litigation? 19 A. Every single document? 20 Q. Uh-huh. 21 A. No, I didn't review every single document. 22 Q. Okay. 23 A. I don't think it's possible to review every 24 single document. 25 Q. Well, I certainly would agree that it's not</p>
<p style="text-align: right;">15</p> <p>1 Nico is not an employee; correct? 2 A. No, he's not. 3 Q. Okay. And you started by saying you spoke to 4 numerous employees. And I want to make sure that these 5 are the employees, there are no other employees. 6 A. I'm just trying to make sure I didn't miss 7 anybody. 8 Q. I know. 9 A. I think that's it. 10 Q. Okay. When you said Bob Coe -- 11 A. Uh-huh. 12 Q. -- you mean Robert Roe, an accountant? 13 A. Yes. 14 Q. Okay. 15 A. Robert Roe. 16 Q. Okay. 17 A. He's not -- I don't believe he's the 18 accountant for the company, though. I believe he's a 19 consultant. 20 Q. What do you -- what do you mean? How's that 21 different? 22 A. I mean that we have someone that is an 23 official accountant for the company that prepares our 24 tax returns. So he's not -- he does not do those 25 functions.</p>	<p style="text-align: right;">17</p> <p>1 possible for one person to do it within the time period 2 of this deposition; right? 3 A. Yes. 4 Q. It would take multiple people to do that? 5 A. I think for the purposes of this deposition, 6 if you'd like to go through the universe of documents 7 that I did review, I'm happy to do that. 8 Q. That's not what I'm asking you. 9 A. Okay. 10 Q. What I'm asking you is, if someone wanted or 11 if a company wanted to prepare itself for this 12 deposition by reviewing every document produced in this 13 litigation, one person in two weeks could not do that? 14 A. One person in two weeks could not do that, 15 no. 16 Q. Okay. And the company did not undertake 17 steps to make sure that multiple people reviewed all of 18 those documents; correct? 19 A. I was the only person that was retained to do 20 that. 21 Q. Okay. So you had told me that you basically 22 could give me a universe of the documents you did 23 review? 24 A. Yes. I can try to undertake that, if you'd 25 like me to do that now.</p>

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<p>18</p> <p>1 Q. Why don't you do that now.</p> <p>2 A. Sure. So at first, I wanted to just make</p> <p>3 sure that I reviewed the videos that -- that we had on</p> <p>4 the Dropbox. So the videos that were produced in</p> <p>5 connection with the -- the discovery as well as review</p> <p>6 those for the source material.</p> <p>7 I also reviewed articles that were published</p> <p>8 by the company that were produced in connection with</p> <p>9 the discovery. I reviewed most, if not all, of the</p> <p>10 depositions that have been conducted in connection with</p> <p>11 this litigation. I reviewed the documents that were</p> <p>12 admitted as exhibits to those depositions because I</p> <p>13 felt that those would be probably the most relevant</p> <p>14 documents to hone in on.</p> <p>15 I also reviewed a lot of e-mails, although I</p> <p>16 don't think anybody could review all the e-mails. A</p> <p>17 lot of them are, like, unopened e-mails and e-mails</p> <p>18 from the general public. But I did review a lot of</p> <p>19 e-mails. I also reviewed the filings in connection</p> <p>20 with the plaintiffs' complaints. And I think that's</p> <p>21 it.</p> <p>22 Q. Okay. When you say complaints, down here, we</p> <p>23 call them lawsuit petitions, down in Texas.</p> <p>24 A. Okay.</p> <p>25 Q. Is that what you mean, those petitions?</p>	<p>20</p> <p>1 that would have the plaintiffs' names on them. I did a</p> <p>2 search that would have Sandy Hook in them.</p> <p>3 Some of those documents don't really pertain</p> <p>4 to Sandy Hook. Like, so, for example, some are just on</p> <p>5 general gun control. Some are on other shootings.</p> <p>6 Some are on other events that were ongoing in the</p> <p>7 country. But I did try to hone my search to documents</p> <p>8 specifically related to the Sandy Hook litigation.</p> <p>9 Q. Okay. So when you did the search for Sandy</p> <p>10 Hook --</p> <p>11 A. Uh-huh.</p> <p>12 Q. -- which returned the phone book in this</p> <p>13 case, how did you -- did you review every document that</p> <p>14 had Sandy Hook in it, or did you select some</p> <p>15 subuniverse of documents that had Sandy Hook in it?</p> <p>16 A. So, like you said, it did return a lot of</p> <p>17 documents. So I tried to review as many of those,</p> <p>18 like, lay eyes on as many of those documents as I</p> <p>19 could.</p> <p>20 Q. Just randomly?</p> <p>21 A. No. As -- as time was available, I would</p> <p>22 review documents. So is your question whether I got</p> <p>23 through all of those documents? I probably didn't.</p> <p>24 Q. Right. How many do you think you did?</p> <p>25 A. Thousands.</p>
<p>19</p> <p>1 A. Yes.</p> <p>2 Q. Okay.</p> <p>3 A. In Connecticut, we call them complaints.</p> <p>4 Q. Yeah. So I have videos on Dropbox, I have</p> <p>5 articles, I have depositions --</p> <p>6 A. Uh-huh.</p> <p>7 Q. -- I have the exhibits in those depositions --</p> <p>8 A. Uh-huh.</p> <p>9 Q. -- some universe of e-mails, and then the</p> <p>10 petitions?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. When you talk about that universe of</p> <p>13 e-mails, how many documents are you talking about?</p> <p>14 A. At least thousands.</p> <p>15 Q. Okay.</p> <p>16 A. Some of them are duplicates, though. So it's</p> <p>17 really hard to say how many documents. But, you know,</p> <p>18 the Bates stamps. So they're all Bates stamped. They</p> <p>19 have individual Bates stamps. But a lot of them are</p> <p>20 duplicates.</p> <p>21 Q. How did you select which documents you wanted</p> <p>22 to review in terms of e-mails?</p> <p>23 A. Good question. So what I did was I did a</p> <p>24 search to try to hone in what I was focusing on. So I</p> <p>25 did a search for things that -- documents, I'm sorry --</p>	<p>21</p> <p>1 Q. Thousands of documents?</p> <p>2 A. I've reviewed thousands of documents.</p> <p>3 Q. Okay. Do you have any idea sitting here</p> <p>4 today about how many pages of documents have the word</p> <p>5 Sandy Hook in them?</p> <p>6 A. I can't give you a number. I don't remember</p> <p>7 the number.</p> <p>8 Q. Would you dispute with me less than 30,000</p> <p>9 pages?</p> <p>10 A. If I reviewed 30,000 pages? Is that what</p> <p>11 you're asking me?</p> <p>12 Q. No. I'm asking you if you --</p> <p>13 A. If it returned 30,000 pages?</p> <p>14 Q. If you would dispute with me that there --</p> <p>15 the word Sandy Hook appear in about 30,000 pages.</p> <p>16 A. No. I probably wouldn't dispute that, no.</p> <p>17 Q. Okay. Let's talk about everything you</p> <p>18 actually physically did. I want to know the times of</p> <p>19 it. So in terms of reviewing documents, how many hours</p> <p>20 did you spend reviewing documents?</p> <p>21 A. I think total review of everything -- is that</p> <p>22 also including the discussion -- the interviews I've</p> <p>23 had with everybody?</p> <p>24 Q. No.</p> <p>25 A. Okay. So total review of documents, I</p>

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<p style="text-align: right;">22</p> <p>1 probably estimate I have about 70 or 75 hours. All 2 told, I probably have, you know, between interviewing 3 people, I probably have over a hundred hours of review. 4 Q. Okay. Well, that's -- let's talk first about 5 the documents. Those 75 hours, when did you do that? 6 A. When? 7 Q. Uh-huh. 8 A. Between the period of January 31st, when I 9 was retained, and this morning. I was reviewing 10 documents this morning. 11 Q. All right. So in terms of interviews, did 12 those happen before the document review or before some 13 of it, after some of it, like, give me the order on 14 that. 15 A. I think they've all been done simultaneously. 16 So I didn't arrive here until Tuesday night. So 17 interviews didn't really start until Wednesday. So I 18 was doing interviews from Wednesday through Saturday. 19 Q. Okay. So if you started -- let's say you did 20 an interview Wednesday. 21 A. Uh-huh. 22 Q. Let's talk about last Wednesday, for 23 instance; right? 24 A. This past Wednesday? 25 Q. Sure. Okay. Let's say you interviewed</p>	<p style="text-align: right;">24</p> <p>1 A. Yes. So I did try to locate all of the 2 videos that are mentioned in the petition. 3 Q. Okay. Were you able to do that? 4 A. Not all of them. 5 Q. Okay. 6 A. I don't think some of them are available just 7 due to the deplatforming, so I don't know that we have 8 a couple of them. 9 Q. That's interesting, because I got all of 10 them. 11 A. One of them that I know that I couldn't find 12 was the video specifically relating to the addresses 13 and the map of the HONR -- the location of the HONR 14 company. That was one of the ones I couldn't find. 15 Q. Were you aware that the last corporate 16 representative, Daria Karpova, she was shown that 17 video? 18 A. She was shown the video, or you showed her 19 the video? 20 Q. I didn't show it to her. 21 A. I don't know. 22 Q. In terms of preparation, you don't know what 23 Ms. Karpova did to prepare? 24 A. I read her deposition. 25 Q. Okay. Well, let me make sure I get an answer</p>
<p style="text-align: right;">23</p> <p>1 somebody that day. And then you reviewed documents, 2 you said, even this morning; right? 3 A. Yeah. 4 Q. And maybe last night too? 5 A. Yes. 6 Q. Okay. So if you hit a document last night 7 and it involved one of those people that you 8 interviewed, you didn't go back and interview them 9 about whatever you saw in that document; right? 10 A. You mean, did I reinterview them? 11 Q. Correct. 12 A. No. 13 Q. Okay. How many hours did you spend watching 14 videos? 15 A. Watching videos, plus taking notes on the 16 videos and the sourcing, probably about 35 hours. 17 Q. Okay. When you said you watched the videos 18 on Dropbox -- 19 A. Uh-huh. 20 Q. Okay. You have an understanding of what 21 those videos were? Like, do you -- do you know -- 22 well, let me put it back this way. One of the things 23 you were asked to do is to prepare for all of the 24 videos that are mentioned in plaintiffs' petitions; 25 correct?</p>	<p style="text-align: right;">25</p> <p>1 to the question. Do you think that that means you know 2 what she did to prepare? 3 A. I don't think she did very much to prepare, 4 to be honest. 5 Q. I don't think she did either, but I do think 6 Brad Reeves showed her some videos. Do you -- do you 7 know about that? 8 A. I don't know what Brad Reeves showed her, no. 9 Q. Okay. 10 A. I haven't spoken to Mr. Reeves. 11 Q. Okay. So we've got the docs and documents in 12 the videos, then you read depositions. Do you count 13 that in your time in document review, or is that 14 something separate? 15 A. No, I think that's document review. 16 Q. Okay. And then that also includes the 17 exhibits of that depositions; right? 18 A. That's correct. 19 Q. Okay. And then another thing you did is the 20 complaints. You read the -- I mean the petitions? 21 A. Yes. 22 Q. Right? And that's also in your document 23 review number? 24 A. Yes. 25 Q. Okay. And then you did interviews?</p>

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<p style="text-align: right;">26</p> <p>1 A. Yes.</p> <p>2 Q. Tell me how long you spent doing interviews.</p> <p>3 A. Between Wednesday and Saturday, I was at</p> <p>4 InfoWars at the -- the primary location at InfoWars all</p> <p>5 day, every day Wednesday through Friday. And then we</p> <p>6 interviewed Mr. Watson for an hour on Saturday. So</p> <p>7 I -- I spent a great deal of time Wednesday through</p> <p>8 Friday interviewing -- interviewing people.</p> <p>9 Q. Since Wednesday, Thursday, Friday, you spent</p> <p>10 a full workday?</p> <p>11 A. Full workday.</p> <p>12 Q. Okay.</p> <p>13 A. Actually, I don't think we left until after</p> <p>14 7. It was a long time.</p> <p>15 Q. Okay. So what I was going to say is three</p> <p>16 times eight is 24, so that would be 24 hours spent</p> <p>17 interviewing. But you think you probably spent a</p> <p>18 little more than that; right? Let's call it 30. Does</p> <p>19 that sound right?</p> <p>20 A. Let's say 25 just to be safe, because I don't</p> <p>21 -- I don't know if it's -- if it's 30. Because some of</p> <p>22 those hours were also, you know, viewing -- viewing the</p> <p>23 location, viewing documents, pulling documents,</p> <p>24 discussions -- privileged discussions with counsel.</p> <p>25 You know, some of it isn't full workdays full of</p>	<p style="text-align: right;">28</p> <p>1 Taube?</p> <p>2 A. I've heard the name. I've not met him or</p> <p>3 spoken to him.</p> <p>4 Q. Okay. And have you talked to Marc Randazza?</p> <p>5 A. No.</p> <p>6 Q. Or Jay Wolman?</p> <p>7 A. No.</p> <p>8 Q. Okay. Okay. So what we've described is time</p> <p>9 reviewing documents, time reviewing videos, time doing</p> <p>10 interviews. Is there any other time that you contend</p> <p>11 that you spent preparing for this deposition?</p> <p>12 A. No, I think that -- that covers it.</p> <p>13 Q. Okay. What is the first -- when is the first</p> <p>14 time that the company did something to preserve</p> <p>15 potential evidence?</p> <p>16 A. I think that this was probably sometime after</p> <p>17 the lawsuit was filed, although I can't give you a</p> <p>18 specific date. I have interviewed employees as to when</p> <p>19 they became aware of when there was a spoliation</p> <p>20 letter. And unfortunately, nobody has any knowledge of</p> <p>21 receiving such a letter.</p> <p>22 So I can't really pinpoint a date when that</p> <p>23 happened. Although, I, in connection with my</p> <p>24 interviews, have tried to ascertain what was done to</p> <p>25 try to get access to the YouTube videos that were lost</p>
<p style="text-align: right;">27</p> <p>1 interviews.</p> <p>2 Q. Sure. Okay. When you say viewing location,</p> <p>3 do you mean the actual premises of InfoWars?</p> <p>4 A. That's correct.</p> <p>5 Q. Okay. When you talk meeting with counsel,</p> <p>6 are there additional hours, or is that included as part</p> <p>7 of your interview time?</p> <p>8 A. I think the -- no, it's not included with the</p> <p>9 interview time, no.</p> <p>10 Q. Okay. How much time did you spend talking to</p> <p>11 counsel?</p> <p>12 A. With Attorney Blott, you mean?</p> <p>13 Q. No, I mean any attorney.</p> <p>14 A. Okay. So maybe a few hours.</p> <p>15 Q. Okay. Which attorneys did you talk to?</p> <p>16 A. I spoke to Attorney Blott and I spoke to --</p> <p>17 his first time is Dustin. I'm so sorry, I don't</p> <p>18 remember his last name.</p> <p>19 Q. I know who you're talking about. It's okay.</p> <p>20 A. And then I spoke to Attorney Pattis in</p> <p>21 Connecticut.</p> <p>22 Q. Those are the only three?</p> <p>23 A. Yes.</p> <p>24 Q. Let's give a gentleman. You may not know</p> <p>25 he's an attorney. Do you know a gentleman named Eric</p>	<p style="text-align: right;">29</p> <p>1 as a result of the deplatforming, which happened prior</p> <p>2 to the lawsuit.</p> <p>3 I believe they hired some company to help</p> <p>4 them do that, but I'm not really sure what the dates</p> <p>5 are.</p> <p>6 Q. All right. A lot of things I want to ask you</p> <p>7 about that.</p> <p>8 A. Sure.</p> <p>9 Q. First, the deplatforming. Did that happen</p> <p>10 before the lawsuit?</p> <p>11 A. According to Mr. Jones, that happened in</p> <p>12 2017.</p> <p>13 Q. Okay. It actually didn't.</p> <p>14 A. Uh-huh.</p> <p>15 Q. So the deplatforming of Mr. Jones' stuff</p> <p>16 happened kind of as a result of this lawsuit.</p> <p>17 A. Uh-huh.</p> <p>18 Q. Happened actually, like, in August 2018,</p> <p>19 months after the lawsuit.</p> <p>20 A. Okay.</p> <p>21 Q. You didn't know that?</p> <p>22 A. I didn't know that.</p> <p>23 Q. Okay. Second, when you said that nobody</p> <p>24 knows when a spoliation letter is sent out, are you</p> <p>25 talking about a spoliation, like, an evidence</p>

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<p>30</p> <p>1 preservation letter from the plaintiffs, or are you 2 talking about a letter inside the company? 3 A. No, I'm talking about a letter that was 4 received from you and your clients. 5 Q. Nobody has that? 6 A. No. 7 Q. Okay. 8 A. Nobody has any knowledge of receiving that. 9 Q. Nobody asked Mr. Taube for it? 10 A. The company is not aware of a spoliation 11 letter. 12 Q. I didn't ask that. And you know that, you're 13 an attorney; right? And I kind of expect that from 14 certain witnesses to, like, evade the very question I'm 15 asking. But you know I didn't ask that question. You 16 asked, does -- has the attorney -- has anybody in the 17 company talked Mr. Taube about the spoliation letter. 18 A. I have not talked to Mr. Taube about it. 19 Q. Okay. Again, has anybody in the company? 20 A. I'm not aware of anybody being aware of the 21 spoliation letter or speaking to Mr. Taube about it. 22 Anybody that I interviewed about this letter, nobody is 23 aware of it. 24 Q. Did you make any efforts to determine who 25 represented the company at the time the suit was filed?</p>	<p>32</p> <p>1 didn't talk to Mr. Taube? 2 A. I haven't talked to Mr. Taube. He doesn't 3 represent the company anymore. 4 Q. When you say -- when you say the company, 5 doesn't represent the company, he doesn't represent 6 Free Speech Systems? 7 A. Not anymore as far as I know. 8 Q. Okay. He does, perhaps, represent other 9 affiliated businesses. Do you know anything about 10 that? 11 A. I don't know. 12 Q. Okay. And does he represent Mr. Jones, do 13 you know that? 14 A. I don't know. 15 Q. Okay. So, first of all, when we talk about a 16 spoliation letter, you haven't laid hands on that; 17 right? 18 A. No. 19 Q. Okay. What about a litigation hold? 20 A. On? 21 Q. First of all, do you know what a litigation 22 hold is inside of a company? 23 A. You mean on the documents, on anything that's 24 produced inside the company? 25 Q. Not produced, per se. I'm saying that at</p>
<p>31</p> <p>1 A. We had a number of attorneys, so I think that 2 Mr. Taube represented the company at that time. But 3 that -- if he had that letter, it was not conveyed to 4 the company. 5 Q. Ms. Paz, I'm not asking you any of those 6 things. I'm not asking you what Mr. Taube's witness or 7 Taube did or anything like that. I'm asking you if you 8 undertook any efforts to determine who represented the 9 company at the outset of suit. 10 A. I think I answered that. I think I said, I 11 think Mr. Taube represented -- 12 Q. I don't want to know the answer to the 13 question. I want to know, did you undertake efforts to 14 find out? 15 A. I've spoken to the employees of the company, 16 I've spoken to Mr. Jones, I've spoken to the attorneys, 17 and it's my understanding that Mr. Taube represented 18 the company at that time. 19 Q. In other words -- okay. So here's what I'm 20 asking. When you spoke to members of the company, was 21 one of the things that you wanted to get from them in 22 terms of information, hey, who was representing you at 23 the time the suit started? 24 A. Sure. 25 Q. Okay. So once you had that information, you</p>	<p>33</p> <p>1 some point in -- first of all, you're not a civil 2 attorney? 3 A. No, I'm not. 4 Q. Okay. So -- 5 A. And I don't practice here either, so -- 6 Q. Sure. 7 A. -- you may use -- 8 Q. Well -- 9 A. -- different terms here. 10 Q. Okay. A litigation hold is a common term in 11 civil law that when a company gets sued, it needs to 12 undertake steps to notify everybody within the 13 constituent organization that documents need to be 14 preserved. Do you understand that? 15 A. Yeah. 16 Q. Okay. When did that litigation hold happen? 17 A. You mean the -- I just want to make sure I 18 understand the question. The notification that once 19 the company was sued, notification to employees of Free 20 Speech to preserve any relevant material? 21 Q. Yes, except one caveat, which is that may 22 have occurred before suit because the company may have 23 anticipated litigation before suit. So that may have 24 occurred before suit, I don't know. 25 A. I don't think that any such efforts were made</p>

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<p>34</p> <p>1 before the suit.</p> <p>2 Q. Okay. Can you tell me when it did happen?</p> <p>3 A. It would have been sometime after the suit.</p> <p>4 I'm not sure exactly what date.</p> <p>5 Q. Okay. And you know that doesn't really help</p> <p>6 me at all; right?</p> <p>7 A. I know it doesn't. But I'm sorry, I can't --</p> <p>8 I'm not going to make a guess.</p> <p>9 Q. Okay. And you've reviewed the depositions in</p> <p>10 this case?</p> <p>11 A. Yes, most of them.</p> <p>12 Q. Okay. Here's the problem I'm having, Ms. Paz</p> <p>13 --</p> <p>14 A. Sure.</p> <p>15 Q. -- because I really wanted to talk to you</p> <p>16 today a lot about preservation of evidence; right? I</p> <p>17 really -- that's something I wanted to talk to you</p> <p>18 about. And the question of when it started in terms of</p> <p>19 litigation hold, I didn't think was going to be a</p> <p>20 difficult question for you to answer since</p> <p>21 Mr. Zimmerman testified to it.</p> <p>22 I thought we'd be able to jump right in</p> <p>23 because you'd know that. But in terms of whatever</p> <p>24 Mr. Zimmerman said about when the company issued a</p> <p>25 litigation hold, in terms of his deposition, you don't</p>	<p>36</p> <p>1 e-mails. There were certain parameters done to try to</p> <p>2 access the videos, such that we could access the</p> <p>3 videos.</p> <p>4 There -- and I believe I testified earlier</p> <p>5 that there was a -- there was a third party company</p> <p>6 that was helping with that, although I'm not sure what</p> <p>7 the name is. I think Attorney Blott could probably get</p> <p>8 that information for you.</p> <p>9 I think that as far as social media goes, I</p> <p>10 think that the testimony previously has been that that</p> <p>11 information can -- that can be accessed through</p> <p>12 Twitter. Are you -- do you also want to know about the</p> <p>13 -- the finances of the company and the documents</p> <p>14 related to the finances, or are we just now in the</p> <p>15 universe of e-mails, articles, and -- and videos?</p> <p>16 Q. Well, let's -- let's deal with that first</p> <p>17 answer first --</p> <p>18 A. Sure.</p> <p>19 Q. -- because what I heard you talking about is</p> <p>20 there were efforts to make -- to search for the</p> <p>21 e-mails?</p> <p>22 A. Yes.</p> <p>23 Q. And efforts made to access the videos?</p> <p>24 A. Yes.</p> <p>25 Q. Right? And these sound to me like things</p>
<p>35</p> <p>1 know that here sitting here today?</p> <p>2 A. I believe I reviewed Mr. Zimmerman's</p> <p>3 deposition. I think Mr. Zimmerman's testimony was</p> <p>4 specifically related to the website and the website</p> <p>5 analytics.</p> <p>6 Q. Okay. That's -- that's -- you believe his</p> <p>7 testimony wasn't about litigation holds or</p> <p>8 preservations of evidence?</p> <p>9 A. Most -- most of what I recall about that</p> <p>10 deposition was about Google analytics.</p> <p>11 Q. All right. So you don't know anything about</p> <p>12 a 2019 letter from Tim Fruge?</p> <p>13 A. I don't. I'm sorry.</p> <p>14 Q. Okay. Or any of his testimony about what he</p> <p>15 told employees to do in terms of evidence preservation</p> <p>16 in that letter?</p> <p>17 A. I have not seen that letter.</p> <p>18 Q. Okay. That's unfortunate. Can you tell me</p> <p>19 -- can you at least tell me everything Free Speech</p> <p>20 Systems did to preserve evidence? If you can't tell me</p> <p>21 when they did it, can you tell me what they did?</p> <p>22 A. Sure. To my knowledge, I think that there</p> <p>23 were efforts undertaken to produce all of the e-mails</p> <p>24 that were given. There were certain search term</p> <p>25 parameters that were given to the company to search the</p>	<p>37</p> <p>1 that were done to attempt to locate documents for</p> <p>2 production in the lawsuit; right?</p> <p>3 A. Uh-huh.</p> <p>4 Q. Right. What I didn't hear is about any</p> <p>5 efforts to preserve documents before that happened. In</p> <p>6 other words, you understand if I'm going to go search</p> <p>7 for documents to produce them, it's important that I</p> <p>8 preserve those documents before that happens. You</p> <p>9 understand what I'm saying?</p> <p>10 A. Well, I do understand what you're saying.</p> <p>11 And I don't think that there's been any deletion of any</p> <p>12 of that information. So, I mean, once they were</p> <p>13 required to be produced and we did the search through</p> <p>14 the databases, I don't have any reason to believe any</p> <p>15 of that information was deleted.</p> <p>16 Q. Okay. Do you have any idea when InfoWars'</p> <p>17 e-mail server was secured and preserved in its current</p> <p>18 state?</p> <p>19 A. As far as a date, no, I don't.</p> <p>20 Q. Sure.</p> <p>21 A. I don't know the date.</p> <p>22 Q. Okay. Well, let's just -- let me do a little</p> <p>23 testifying for you. And you can take my representation</p> <p>24 or you can leave it; right? But from what I understand</p> <p>25 from Mr. Zimmerman's testimony --</p>



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<p>38</p> <p>1 A. Uh-huh.</p> <p>2 Q. -- from the company's discovery answers, no</p> <p>3 efforts were made to look for any documents, just to do</p> <p>4 these things you're talking about. Search for e-mails,</p> <p>5 search for videos. None of that was done until</p> <p>6 February 2019 when discovery was ordered in the Lewis</p> <p>7 case. All right?</p> <p>8 And what I'm wondering is, is if between</p> <p>9 April 2018 and the following year in February 2019, if</p> <p>10 there was an employee who had an e-mail on the InfoWars</p> <p>11 e-mail server and it was personally incriminating to</p> <p>12 them, there is nothing stopping them from taking that</p> <p>13 e-mail off the server before that search happened;</p> <p>14 right?</p> <p>15 A. I don't think that that's accurate. I think</p> <p>16 it would still have been in a deleted e-mail box. So</p> <p>17 I -- I don't think that that's accurate. But -- and I</p> <p>18 don't -- I don't -- I don't want to agree or disagree</p> <p>19 with the dates because I don't know the answer to it.</p> <p>20 Q. Sure.</p> <p>21 A. So, I mean, if those are your</p> <p>22 representations, that's fine. But I just don't know.</p> <p>23 But I don't have any reason to believe that somebody</p> <p>24 deleted it off of the server and that I wouldn't still</p> <p>25 be able to access it.</p>	<p>40</p> <p>1 question.</p> <p>2 A. Okay.</p> <p>3 Q. My question's not whether he can get -- get</p> <p>4 information off. Like, you're talking about pulling it</p> <p>5 off so he can produce it. I'm saying he wants to get</p> <p>6 rid of it. I'm saying he wants to delete it --</p> <p>7 A. Oh, oh, oh --</p> <p>8 Q. -- and make sure nobody ever sees it. He can</p> <p>9 do that.</p> <p>10 A. Oh, I don't know. I don't know the answer to</p> <p>11 that, I'm sorry.</p> <p>12 Q. Okay. So it would be fair to say that your</p> <p>13 testimony here today is that you don't know if anything</p> <p>14 has been done to preserve the e-mails on the InfoWars</p> <p>15 server before the time it was that they were to produce</p> <p>16 those documents?</p> <p>17 A. I don't know the time period, no.</p> <p>18 Q. Okay. And more than that, you don't know --</p> <p>19 beyond time period, you don't know that anything was</p> <p>20 ever done to preserve the e-mails themselves; right?</p> <p>21 A. Aside from pulling them off the server, no.</p> <p>22 Q. Right. Well, I understand this is again</p> <p>23 something you may not know about, I would not expect</p> <p>24 you to know about. But in February 2019, an entire</p> <p>25 mirror image copy was -- like, a backup.</p>
<p>39</p> <p>1 Q. Well, if there have been no efforts to</p> <p>2 preserve anything, then we don't know. You wouldn't</p> <p>3 have any basis to know whether something's been deleted</p> <p>4 or not; right?</p> <p>5 A. I think we produced a lot of things that were</p> <p>6 in deleted folders and spam boxes. So I don't have a</p> <p>7 reason to believe that there was anything that was</p> <p>8 deleted.</p> <p>9 Q. All right. You have no special expertise in</p> <p>10 IT, we've talked about that; right?</p> <p>11 A. No, I don't.</p> <p>12 Q. All right. And so if somebody like</p> <p>13 Mr. Zimmerman, who has a bunch of expertise in IT,</p> <p>14 wanted to get an e-mail off that server, you don't</p> <p>15 doubt that that could be possible; right? You don't --</p> <p>16 you don't have enough information sitting here today</p> <p>17 whether to know that is possible or not.</p> <p>18 A. I'm sorry, is the question whether -- does</p> <p>19 Mr. Zimmerman have the ability to get e-mails off of</p> <p>20 the server?</p> <p>21 Q. More specifically, that you don't possess the</p> <p>22 knowledge to know whether he does or not.</p> <p>23 A. I don't think that's accurate. I think he</p> <p>24 can -- can get information off the server.</p> <p>25 Q. I don't think you're understanding the</p>	<p>41</p> <p>1 A secure backup was created of the e-mail</p> <p>2 system. All right? Do you understand how that process</p> <p>3 works?</p> <p>4 A. I know that it can be done, yes.</p> <p>5 Q. Okay.</p> <p>6 A. I don't know -- I don't know the</p> <p>7 technologicals of how it's done, but I do know it can</p> <p>8 be done.</p> <p>9 Q. And before I just told you that, you didn't</p> <p>10 know it happened; right?</p> <p>11 A. I didn't know the date that it happened.</p> <p>12 Q. Okay. But you did know that there was a</p> <p>13 mirror copy made of the entire e-mail server?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. That would be -- that would be an</p> <p>16 effort to preserve the e-mails; right?</p> <p>17 A. Yes, I just don't know when it was.</p> <p>18 Q. Okay. All right. Because I know that you</p> <p>19 don't know when it was. I just want to make sure, now</p> <p>20 that you've told me that there were efforts made to</p> <p>21 preserve the e-mails, do you know of anything else that</p> <p>22 was made to preserve anything?</p> <p>23 A. Aside from the e-mails?</p> <p>24 Q. Uh-huh.</p> <p>25 A. Can you be more specific as to what you're --</p>

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<p style="text-align: right;">42</p> <p>1 what you're talking about?</p> <p>2 Q. I'm -- I'm saying that I asked you here to</p> <p>3 testify to me about InfoWars' efforts to preserve</p> <p>4 evidence. And so far, I haven't heard anything. And</p> <p>5 I'm wondering what was done following suit to make sure</p> <p>6 that potential evidence was available for use in this</p> <p>7 lawsuit.</p> <p>8 A. I think part of the issue here -- and I just</p> <p>9 want to -- if I can go back a little bit to talk about</p> <p>10 the employees that I interviewed -- is the structure of</p> <p>11 the company.</p> <p>12 Q. Okay.</p> <p>13 A. And there's -- and that's probably the</p> <p>14 problem that we're getting into. And it was -- and</p> <p>15 it's my issue as well of getting this information is</p> <p>16 that there is no one person at the company that's</p> <p>17 designated to do such things. There are different</p> <p>18 departments and one department does not have any</p> <p>19 communication with another department.</p> <p>20 And that's just based on my interviews and</p> <p>21 observations over the last couple of weeks. But -- so</p> <p>22 essentially, if there were documents that were produced</p> <p>23 by one department, they have their own specific</p> <p>24 policies and procedures and ways they do things there</p> <p>25 as far as preservation of what they do.</p>	<p style="text-align: right;">44</p> <p>1 These are all separate departments that</p> <p>2 really aren't talking to each other. So I think that</p> <p>3 was a bit of the difficulty that we're having in</p> <p>4 answering your specific question, if that makes sense.</p> <p>5 Q. It does.</p> <p>6 MR. BANKSTON: Objection.</p> <p>7 Nonresponsive.</p> <p>8 Q. (BY MR. BANKSTON) If there was a person at</p> <p>9 Free Speech Systems in charge of preserving documents</p> <p>10 for this litigation who had that as part of their</p> <p>11 duties, you haven't spoken to that person?</p> <p>12 A. There is no such person.</p> <p>13 Q. Okay. So if Mr. Fruge -- Tim Fruge, you know</p> <p>14 who that is?</p> <p>15 A. I've heard the name.</p> <p>16 Q. Okay. You haven't spoken to him?</p> <p>17 A. I have not spoken with him.</p> <p>18 Q. Okay. So if that person was the person who</p> <p>19 was in charge of preserving documents for this</p> <p>20 litigation, you have no information from him?</p> <p>21 A. I don't know that that's accurate. I'll --</p> <p>22 just based on your representation. I don't know that</p> <p>23 --</p> <p>24 Q. In fact, let's go ahead and get that</p> <p>25 question. I think that's a good -- that's a better way</p>
<p style="text-align: right;">43</p> <p>1 Like, so for -- for example, right,</p> <p>2 production. The production department may produce on a</p> <p>3 daily basis news articles that they print out for the</p> <p>4 hosts; right? Those particular news articles that they</p> <p>5 print out for the hosts, those are not retained. Those</p> <p>6 -- those are, you know, shredded and they get rid of</p> <p>7 it.</p> <p>8 There's no retention policy for those</p> <p>9 documents. There's also no retention policy for, like,</p> <p>10 initial video clips. So, like, the final product -- so</p> <p>11 if you're interested in video clips or raw footage of</p> <p>12 things before it was cut into a finalized version,</p> <p>13 those things aren't saved either.</p> <p>14 So there's no -- in any individual</p> <p>15 department, there's really not a retention policy like</p> <p>16 that to retain those types of documents. So if that's</p> <p>17 what you're interested in, nobody is really retaining</p> <p>18 those documents themselves.</p> <p>19 As far as the e-mail go -- e-mails go,</p> <p>20 there's Mr. Zimmerman, who is, you know, the IT person.</p> <p>21 And he handles things related to the website. There's</p> <p>22 also a separate person that handles information in</p> <p>23 connection with PQPR, which is a separate company, for</p> <p>24 the sales end of things. And those things are all</p> <p>25 separate too.</p>	<p style="text-align: right;">45</p> <p>1 to ask that question. If Tim Fruge had any involvement</p> <p>2 or management of the preservation of documents involved</p> <p>3 in this case, that is information you don't have?</p> <p>4 A. No.</p> <p>5 Q. Whether that's true or not?</p> <p>6 A. Right.</p> <p>7 Q. Okay. When it came to produce -- time to</p> <p>8 produce documents in this lawsuit, who was responsible</p> <p>9 for searching the company's e-mail server?</p> <p>10 A. I think that would have been Mr. Zimmerman</p> <p>11 who would have done the search. When I talked to</p> <p>12 Mr. Zimmerman -- did I -- did I put him on my list</p> <p>13 earlier?</p> <p>14 Q. You did not.</p> <p>15 A. I'm sorry. I did talk to Mr. Zimmerman.</p> <p>16 Let's add him.</p> <p>17 Q. Okay. Let's go ahead and make sure before we</p> <p>18 go on any further, is there anybody else we need to</p> <p>19 add? Because I don't -- I don't want -- what I don't</p> <p>20 want to happen is, coming to other questions and going,</p> <p>21 oh, no. Actually, I can answer that question because</p> <p>22 here's this other person I talked to I never told you</p> <p>23 about.</p> <p>24 A. I understand. I'm doing my best here to</p> <p>25 remember everybody I spoke to. I don't have --</p>

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<p>46</p> <p>1 Q. Do you have any notes on who you talked to?</p> <p>2 A. You know, I did have it in my notes, but</p> <p>3 unfortunately, I didn't print that page. That page is</p> <p>4 missing.</p> <p>5 Q. Okay.</p> <p>6 A. So I did not print that page. I did write it</p> <p>7 down, but it's not in there -- in my notes for some</p> <p>8 reason.</p> <p>9 Q. Okay.</p> <p>10 A. But I did speak to Mr. Zimmerman. I'm sorry,</p> <p>11 can you repeat the original question.</p> <p>12 Q. I just -- was -- I believe what you answered,</p> <p>13 he was the person responsible for searching the e-mail</p> <p>14 server?</p> <p>15 A. Yes. And I think he -- he testified to that</p> <p>16 as well at some point.</p> <p>17 Q. Now, when it came to anything besides</p> <p>18 e-mails, besides stuff that came off the e-mail</p> <p>19 servers, when it came to documents that may have been</p> <p>20 on any individual devices among any individual</p> <p>21 employees, who was responsible for collecting those</p> <p>22 documents?</p> <p>23 A. You mean like the work computers?</p> <p>24 Q. Sure.</p> <p>25 A. I think that that would have fallen in the</p>	<p>48</p> <p>1 did it, or, did it, quote, unquote. And that not a</p> <p>2 single document -- not a single employee, single one of</p> <p>3 them, returned a single document. Does that sound</p> <p>4 accurate to you?</p> <p>5 A. I don't think it's outside of the realm of</p> <p>6 possibility just given what I know about how the</p> <p>7 company operates.</p> <p>8 Q. But that would just be total inference on</p> <p>9 your part? You don't have any firsthand information</p> <p>10 about whether any employees returned any documents in</p> <p>11 the search for documents in this case?</p> <p>12 A. I believe that it's true that they did not</p> <p>13 return any documents on their personal -- on their work</p> <p>14 computers. So I believe I read that. But, again, I</p> <p>15 don't think that that's out of the realm of what is</p> <p>16 normal, given the structure and the way the company</p> <p>17 operates.</p> <p>18 Q. You -- you think -- for -- okay. For how</p> <p>19 this particular company operates?</p> <p>20 A. Yes.</p> <p>21 Q. It's very unusual for a company who's been</p> <p>22 sued that needs to preserve and produce evidence to</p> <p>23 just tell every individual employee who might be</p> <p>24 involved in that malfeasance to just go look for</p> <p>25 documents themselves. That is unusual; right?</p>
<p>47</p> <p>1 IT, so I think Mr. Zimmerman would have done that as</p> <p>2 well.</p> <p>3 Q. Okay. Do you remember actually him</p> <p>4 testifying that it was actually the individual</p> <p>5 employees, that he didn't do that at all?</p> <p>6 A. I don't remember, I'm sorry.</p> <p>7 Q. Okay. So -- because I wanted to ask you</p> <p>8 about this idea that Free Speech Systems just left it</p> <p>9 up to complete individual employees to go search their</p> <p>10 individual systems and return their documents. And you</p> <p>11 aren't going to be able to talk about that process?</p> <p>12 A. Whether or not the individual employees had</p> <p>13 gone through their devices themselves?</p> <p>14 Q. Uh-huh.</p> <p>15 A. Are we including their phones, their personal</p> <p>16 phones?</p> <p>17 Q. Sure, why not.</p> <p>18 A. Okay. I know that they went through their</p> <p>19 personal phones themselves. But as far as their work</p> <p>20 computers, I'm not sure.</p> <p>21 Q. You're not sure if that happened?</p> <p>22 A. No, I think it happened. But I don't know</p> <p>23 whether they did it or Mr. Zimmerman did it.</p> <p>24 Q. Okay. Because, see, here's the problem that</p> <p>25 I have, is I have the testimony is that the employees</p>	<p>49</p> <p>1 A. It's not how I would have done it.</p> <p>2 Q. Okay. Now, you were talking earlier about</p> <p>3 document retention, but there is a document retention</p> <p>4 policy at InfoWars; right?</p> <p>5 A. I don't think that's accurate.</p> <p>6 Q. All right. You understand that there are</p> <p>7 messaging systems which have been used inside InfoWars</p> <p>8 other than e-mail; correct?</p> <p>9 A. Yes.</p> <p>10 Q. For this deposition, did you search those</p> <p>11 systems or have someone search them for you?</p> <p>12 A. Did I, personally? No. I've relied on</p> <p>13 what's been produced already in the document</p> <p>14 production.</p> <p>15 Q. Got you. So anything that you looked at was</p> <p>16 already produced long time ago?</p> <p>17 A. I don't think that's the entire universe of</p> <p>18 what I looked at. So I definitely have updated</p> <p>19 financials so that I could speak to them at the</p> <p>20 deposition. I have updated information as far as, you</p> <p>21 know, employees who work there or didn't work there.</p> <p>22 So there are documents that I reviewed that</p> <p>23 aren't in the production. So I don't think it's the</p> <p>24 entire universe.</p> <p>25 Q. Let's stick to the -- just the messaging</p>

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<p>50</p> <p>1 systems. Let's stick to messaging systems used inside 2 of InfoWars that are not e-mail. Okay? 3 A. Okay. 4 Q. In terms of those documents -- 5 A. Uh-huh. 6 Q. -- all right? Anything, and, well, let's 7 just -- has anything in the -- the -- in the history of 8 this litigation, are there any documents produced from 9 those systems? From systems other than e-mail? 10 A. Whether -- you mean whether they were 11 produced? 12 Q. Uh-huh. 13 A. I know that Alex has produced a lot of 14 documents and I know that there was a time that they 15 stopped using specific platforms. Like, so, for 16 example, Yahoo! Messenger, they had used at a point in 17 time and then they stopped using it. Slack as well, 18 they stopped using. 19 So as far as the time period for those, I'm 20 not really sure whether those were produced, because 21 they stopped using them. 22 Q. Well, I mean, InfoWars is to this day using, 23 like, Rocket.Chat; right? 24 A. I don't know if they're using it to this day, 25 but I think that it's -- has been used prolifically.</p>	<p>52</p> <p>1 Q. Okay. 2 A. I'm not that technologically savvy. 3 Q. Okay. And Rocket.Chat was used, I mean, I'd 4 say to the present day. And you may be right, maybe 5 they stopped using it yesterday. But throughout the 6 events since they've been sued, the company has been 7 using Rocket.Chat? 8 A. You mean 2018 forward? 9 Q. Correct. 10 A. I -- I do believe that in the period after 11 2018, they were using Rocket.Chat. 12 Q. Okay. Were those logs preserved? 13 A. I'm not really sure. 14 Q. Okay. Were they searched ever? 15 A. So here's my -- here's the problem I have 16 with that specific question, is because depending on 17 the agreement with those particular servers, like, for 18 example, I know that Slack doesn't save all of the 19 chats unless you're, you know, you pay them monthly. 20 Some of these are free -- free plans. 21 And then it will only save up to a certain 22 period of time. And then to go back to the -- to -- to 23 way prior chats, you would have to reach out to Slack 24 itself -- 25 Q. Okay.</p>
<p>51</p> <p>1 Q. All right. So let's go back to -- the 2 question I asked was, have there been any documents 3 produced from any messaging system that isn't e-mail? 4 A. I don't know. 5 Q. Okay. And then as far as for this 6 deposition, when you had topics to go prepare for -- 7 A. Uh-huh. 8 Q. -- if there is any information that's in any 9 of those systems, you didn't go look for it for this 10 deposition? 11 A. I didn't -- I did not, no. 12 Q. Okay. And nobody in the company went and 13 searched through those; right? For this deposition. 14 A. For this deposition? 15 Q. Correct. 16 A. I don't -- I don't know. I don't think so. 17 Q. Okay. So you mentioned that you're aware of 18 what rocket slack is? 19 A. Yes. 20 Q. All right? I mean, I'm sorry. I said that 21 because Rocket.Chat is what I meant to say. 22 A. Rocket.Chat, yes. 23 Q. Rocket.Chat is like a self-hosted version of 24 Slack; right? You understand that? 25 A. I don't know how it works, to be honest.</p>	<p>53</p> <p>1 A. -- in order to get those documents. So I 2 don't know that the company has access to those things 3 going back that far just because I don't think that -- 4 Q. What do you mean, that far? 5 A. 2018 was four years ago. 6 Q. Okay. 7 A. So I don't think they -- I don't know that 8 they can go back four years -- 9 Q. Well, here's what I'm -- 10 A. -- in their chat logs. 11 Q. Okay. Here's what I'm really asking, is the 12 company -- 13 A. Sure. 14 Q. -- was sued in April 2018? 15 A. Sure. 16 Q. All right. So let's go to May 2018. 17 A. Uh-huh. 18 Q. The company had possession of whatever the 19 Rocket.Chat logs were in May 2018; right? 20 A. For what time period? 21 Q. For May 2018. 22 A. For that month? 23 Q. Sure. 24 A. Sure. 25 Q. And were anything done to preserve that?</p>

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<p>54</p> <p>1 A. I don't know.</p> <p>2 Q. Okay. Okay. So another messaging system</p> <p>3 that was used was -- so we talked about Rocket.Chat;</p> <p>4 right? Another messaging system that was used was</p> <p>5 Slack. And do you know when the company stopped using</p> <p>6 Slack?</p> <p>7 A. I'm -- honestly, I'm not sure. It was -- it</p> <p>8 was a while ago. It's been a while. They have not</p> <p>9 used Slack in a long time.</p> <p>10 Q. What does that mean? I don't know what a</p> <p>11 long time means.</p> <p>12 A. Within the last couple years.</p> <p>13 Q. Okay. What about since they've been sued?</p> <p>14 A. I'm not sure.</p> <p>15 Q. Okay. And I take it, then, you don't know if</p> <p>16 Slack has been preserved?</p> <p>17 A. As I said, I don't think Slack -- the way</p> <p>18 that their plan worked, I don't think you can go back</p> <p>19 that far. So, like, for example, say you were -- we</p> <p>20 were sued in 2018.</p> <p>21 Q. Uh-huh.</p> <p>22 A. It really only -- you can only go back a week</p> <p>23 or so in the -- in the chat logs.</p> <p>24 Q. Are you -- when you say you can only go back</p> <p>25 a week or so in the chat logs, what are you basing that</p>	<p>56</p> <p>1 A. Yeah, to find out.</p> <p>2 Q. Did the -- did the company ever do that?</p> <p>3 A. I did not do that, no.</p> <p>4 Q. I'm not asking what you did. I'm asking what</p> <p>5 the company did.</p> <p>6 A. I don't know.</p> <p>7 Q. Okay. Do you know what Wire is, messaging</p> <p>8 system called Wire?</p> <p>9 A. I've heard of it.</p> <p>10 Q. Oh, was that preserved?</p> <p>11 A. I don't know.</p> <p>12 Q. Was it searched?</p> <p>13 A. I don't know. I think you'd have to ask</p> <p>14 Mr. Zimmerman that. He's more technologically</p> <p>15 available for it.</p> <p>16 Q. Well, here's the thing, Ms. Paz. I did ask</p> <p>17 Mr. Zimmerman about it. This is the fifth time I've</p> <p>18 tried to take this deposition. All right? And -- and</p> <p>19 I did try to talk to Mr. Zimmerman. That didn't work</p> <p>20 so well. I tried to talk to Mr. Dew, tried to talk to</p> <p>21 Mr. Karpova. So in terms of --</p> <p>22 A. Ms. Karpova.</p> <p>23 Q. Ms. Karpova. So if you are going to be</p> <p>24 referring me to other people who have already been</p> <p>25 deposited, I don't care about what they say that I need</p>
<p>55</p> <p>1 on? Is that just something --</p> <p>2 A. I have experience with Slack. I've used</p> <p>3 Slack in my -- in my professional life.</p> <p>4 Q. Okay.</p> <p>5 A. So I know that unless you pay for a plan, you</p> <p>6 can't go back to -- to your entire universe of</p> <p>7 conversations. They're not preserved.</p> <p>8 Q. Okay. Because one thing I'm having some</p> <p>9 confusion on is because we have a pleading in this</p> <p>10 case --</p> <p>11 A. Uh-huh.</p> <p>12 Q. -- from counsel of record in this case that</p> <p>13 says the Slack logs were preserved.</p> <p>14 A. Okay.</p> <p>15 Q. Do you know if that's accurate or not?</p> <p>16 A. I don't know. And I don't know what time</p> <p>17 period that would be from.</p> <p>18 Q. Okay. And then you also said something</p> <p>19 about, like, you would have to reach out to Slack for</p> <p>20 -- to check on this information. Has that ever been</p> <p>21 done?</p> <p>22 A. I don't know if Slack even preserves that</p> <p>23 information, to be honest.</p> <p>24 Q. Well, you're the one who said you would have</p> <p>25 to reach out to Slack.</p>	<p>57</p> <p>1 to talk to them. I'm here to talk to you. And from</p> <p>2 what I hear you saying, is that you don't know the</p> <p>3 answer to that question --</p> <p>4 A. I don't.</p> <p>5 Q. -- of whether that's -- okay. Do you know</p> <p>6 anything about Basecamp? Do you know what Basecamp is?</p> <p>7 A. No.</p> <p>8 Q. Okay. So InfoWars employees, you don't know</p> <p>9 if they've used Basecamp to communicate about stories</p> <p>10 in Sandy Hook?</p> <p>11 A. I don't know.</p> <p>12 Q. Okay. So have you read just the depositions</p> <p>13 in this case, or have you read testimony taken up in</p> <p>14 Connecticut?</p> <p>15 A. I've read one or two of the depositions in</p> <p>16 Connecticut. I don't think I've read them all.</p> <p>17 Q. Okay. Well, here's the thing is Mr. Salazar</p> <p>18 testified up in Connecticut. Have you read his --</p> <p>19 A. I did not read his deposition.</p> <p>20 Q. Okay. Well, he testified that they talked</p> <p>21 about Basecamp and I'm just wondering --</p> <p>22 A. Okay.</p> <p>23 Q. -- has -- has there been any effort to find</p> <p>24 those conversations?</p> <p>25 A. I don't know.</p>

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<p>58</p> <p>1 Q. You've never reviewed any conversations that 2 are -- 3 A. No. 4 Q. -- Basecamp messages? 5 A. No. 6 Q. Okay. Do you know who Kurt Nimmo is? 7 A. Yes. 8 Q. Okay. Kurt Nimmo was deposed in Lafferty. 9 You understand that? 10 A. Sure. 11 Q. Did you read his deposition? 12 A. I don't remember. I might have, but I don't 13 remember. 14 Q. All right. Well, because Exhibit 8 -- I'm 15 sorry. Exhibit 13 to Kurt Nimmo's deposition -- 16 A. Uh-huh. 17 Q. -- on page 103 of his Lafferty deposition -- 18 A. Uh-huh. 19 Q. -- there's a question and answer exchange I 20 want to ask you about. And the -- 21 A. Sure. 22 Q. -- question is, "Would it be fair to say that 23 plaintiffs' Exhibit 13 is a Basecamp message from Paul 24 Watson?" The answer is, "Right." Then the next 25 question is, "And it's warning, quote, be careful to</p>	<p>60</p> <p>1 to talk to him. 2 Q. What do you mean, you tried to find out his 3 -- and make efforts to find out? 4 A. I just -- I wasn't able to reach out to him. 5 Q. He was deposed in Lafferty. Everybody has 6 his information. 7 A. Okay. But I tried to reach out to him. He 8 -- 9 Q. Wait. Hold on. Let's make sure I understand 10 this. 11 A. Sure. 12 Q. Because I thought you just said that you 13 couldn't find his information. 14 A. I think what I said was, I tried to reach out 15 to him. 16 Q. Okay. Because I -- I -- we're going to maybe 17 need to stop at a break and go look at what was said on 18 the court reporter here. 19 A. Okay. 20 Q. Because I thought what you were saying is you 21 were unable to locate his contact information. 22 A. I don't know that I was unable to locate it. 23 I think that we tried to -- 24 Q. How did you try? 25 A. -- reach out to him by phone.</p>
<p>59</p> <p>1 avoid stuff about crisis actors and claims that stories 2 were published the day before the event. This is 3 radical. This info." 4 And I'm -- I'm curious because I don't have 5 any Basecamp messages. I certainly don't have that 6 one, which is very interesting to me. 7 A. I have not seen that message. 8 Q. Okay. That's going to be my question is, you 9 have not seen this message about crisis actors on 10 Basecamp that's being referred to in Mr. Nimmo's 11 deposition? 12 A. No. 13 Q. If that document does exist, it's not 14 something that was provided to you? 15 A. I haven't seen it. 16 Q. Okay. He's -- so Kurt Nimmo, you understand 17 he's -- tell me who he is. 18 A. Well, I know who he was because he's no 19 longer employed by the company. But I think that in a 20 relevant time period, I believe 20 -- maybe '18 and 21 prior, he was the head writer at InfoWars. 22 Q. Did you talk to him? 23 A. I was not able to locate him. He's not a 24 current employee. But I did make efforts to try to 25 find out his current information, but we were not able</p>	<p>61</p> <p>1 Q. Okay. So if I go talk to Kurt Nimmo, he's 2 going to have a phone record of an InfoWars number or 3 your number calling him? 4 A. I don't know. 5 Q. Well, I mean, if your testimony's truthful 6 today, that would be the case; right? 7 A. I didn't -- I wasn't able to get in contact 8 with him. 9 Q. I'm not -- I'm -- that's not what I'm asking 10 you. I'm asking, did you call him? 11 A. I called a lot of people. I think I did try 12 to call him. 13 Q. Okay. So -- but -- but your testimony would 14 be -- 15 A. I didn't speak to him, though, no. 16 Q. Your testimony is that either you or somebody 17 at InfoWars called him for this deposition? 18 A. I know we tried to -- I know we tried to get 19 his contact information. I asked Melinda for his 20 contact information, she didn't have it. I don't know 21 whether I called him and left a voicemail and he didn't 22 pick up. I know I haven't talked to him, so I'm not 23 honestly sure. 24 Q. Okay. So I just want to make sure when you 25 say you're not honestly sure, not you are sure you</p>

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<p>62</p> <p>1 haven't talked to him?</p> <p>2 A. I am sure I haven't talked to him.</p> <p>3 Q. What you're not sure of is if you've tried to</p> <p>4 talk to him?</p> <p>5 A. I know I asked for his contact information,</p> <p>6 but I'm not sure if I actually called.</p> <p>7 Q. Okay. That's -- before we go on any</p> <p>8 further --</p> <p>9 A. Sure.</p> <p>10 Q. -- are there people you tried to talk to and</p> <p>11 couldn't, other than Kurt Nimmo?</p> <p>12 A. I think Kurt was the only one.</p> <p>13 Q. Okay.</p> <p>14 A. Most people were pretty responsive.</p> <p>15 Q. Okay. You don't remember leaving voicemails</p> <p>16 for anybody else?</p> <p>17 A. I left a couple of voicemails for Nico. He</p> <p>18 returned my call, though, and we did speak.</p> <p>19 Q. Okay.</p> <p>20 A. We went back and forth with Mr. Watson.</p> <p>21 There was a time difference there, but ultimately, we</p> <p>22 were able to speak.</p> <p>23 Q. I'm just talking about people you tried to --</p> <p>24 A. Yeah.</p> <p>25 Q. -- but couldn't.</p>	<p>64</p> <p>1 whether any such text messages currently exist and are</p> <p>2 available to you, two, whether they ever existed, and</p> <p>3 three, if anything was ever done to preserve them?</p> <p>4 A. I think that when the lawsuit happened and</p> <p>5 when we got notice that we needed to preserve these</p> <p>6 things, we asked the employees to go through their cell</p> <p>7 phones to find any information. And if there was, they</p> <p>8 were -- they were given to us and then we were -- we</p> <p>9 gave them to our attorneys.</p> <p>10 Q. Why do you think that? Why do you think the</p> <p>11 employees were told that? Who told you that?</p> <p>12 A. I don't want to say anything that's</p> <p>13 privileged because I had a number of conversations with</p> <p>14 counsel.</p> <p>15 Q. Okay. I mean, let's do it this way. We know</p> <p>16 it's not a document because you don't have a litigation</p> <p>17 hold. You don't know when that happened?</p> <p>18 A. No. I don't -- I don't think it's a</p> <p>19 document, no.</p> <p>20 Q. Okay. And so we know, I mean, at least</p> <p>21 I know you didn't talk to Tim Fruge; right?</p> <p>22 A. No, I didn't.</p> <p>23 Q. All right. So where does this information</p> <p>24 come from, the idea that -- that, yeah, I mean --</p> <p>25 I mean, if you're just going to have to say counsel,</p>
<p>63</p> <p>1 A. I think Kurt is the only one.</p> <p>2 Q. Kurt. Okay. Okay. Do you know what Pidgin</p> <p>3 is? Not the bird.</p> <p>4 A. No.</p> <p>5 Q. Okay. Pidgin's a messaging communication</p> <p>6 system. Did you know that was used inside of InfoWars?</p> <p>7 A. I don't know.</p> <p>8 Q. Okay. You didn't make any efforts to go find</p> <p>9 anything from Pidgin?</p> <p>10 A. No.</p> <p>11 Q. You don't know if anything was preserved from</p> <p>12 Pidgin?</p> <p>13 A. I don't know anything about Pidgin.</p> <p>14 Q. Okay. There are text messages between</p> <p>15 employees talking about Sandy Hook. That was something</p> <p>16 that's happened over the years; right?</p> <p>17 A. I'm sure it has.</p> <p>18 Q. Okay. Did you do anything to try to figure</p> <p>19 that out, if there were any?</p> <p>20 A. If -- if there -- if the employees produced</p> <p>21 any, or if they actually --</p> <p>22 Q. Let's -- let's -- let's do a big one so you</p> <p>23 can give me the whole answer.</p> <p>24 A. Sure.</p> <p>25 Q. Which is, did you do anything to verify, one,</p>	<p>65</p> <p>1 you can say counsel, I guess.</p> <p>2 A. I think it came from counsel.</p> <p>3 Q. Okay.</p> <p>4 A. So I don't want to talk about my</p> <p>5 conversations with counsel.</p> <p>6 Q. And you've never talked to any employees</p> <p>7 about any other text messages?</p> <p>8 A. No. I don't want -- I don't think that</p> <p>9 that's accurate. So I -- when I spoke to Rob Dew, I</p> <p>10 had a long conversation with Rob -- Rob Dew. He and I</p> <p>11 talked about him looking through his phone and things</p> <p>12 like that. So I don't think that it's accurate that</p> <p>13 the employees didn't talk to me about it.</p> <p>14 Q. Okay. In terms of what was done to preserve</p> <p>15 cell phone messages, text messages, or who produced</p> <p>16 them or what may exist, you don't know that?</p> <p>17 A. I think in terms of what was done, the</p> <p>18 employees were asked to review their phones.</p> <p>19 Q. And again, you have no personal knowledge of</p> <p>20 that and no information from any employee that says</p> <p>21 that that happened; right?</p> <p>22 A. That's not accurate.</p> <p>23 Q. Okay. Which employee told you that there</p> <p>24 were directions made to search their phone?</p> <p>25 A. As I previously indicated, I think I spoke to</p>

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<p>66</p> <p>1 Rob Dew about it and I think Rob Dew indicated he 2 searched his phone. 3 Q. I get that you testified that Rob Dew said he 4 searched his phone. 5 A. Yeah. 6 Q. I'm asking you about conversations about the 7 company's instructions to employees about their phone. 8 A. Oh, I don't know. 9 Q. Did Rob Dew tell you anything about that? 10 A. Oh, I don't know. 11 Q. Okay. Have we talked about all the 12 applications and messaging systems that InfoWars 13 employees have messaged each other on in terms of 14 preserving documents? 15 A. Did we talk about Yahoo! Messenger? 16 Q. Yes, you briefly talked about that. 17 A. Okay. Slack. I think that's it. 18 Q. Okay. Now, Mr. Jones' text messages, when 19 were those preserved? 20 A. I don't know. 21 Q. When were they searched? 22 A. I don't know. 23 Q. You know about Ms. Williamson's -- the New 24 York Times reporter's texts to Mr. Jones that she sent 25 to us, do you know anything about that?</p>	<p>68</p> <p>1 single piece of paper in two weeks' time, so -- 2 Q. I agree. 3 A. -- so to that -- to that end, I think that I 4 tried to hone in on the things that were most 5 important. So I did try to address some of the things 6 that were wrong with the last two depositions that were 7 done. 8 Q. All right. One of the things that went wrong 9 with the last two depositions were done was testimony 10 about the preservation of documents. And one of those 11 had to do with Mr. Jones' text messages. 12 A. Uh-huh. 13 Q. Which you don't know when they were preserved 14 or when they were searched? 15 A. I'm sorry, I don't. 16 Q. Okay. And, for instance, one of the things 17 that was -- let me ask you this way. Do you believe 18 Mr. Jones has produced all of his text messages 19 relating to Sandy Hook that he had in his possession 20 after the anticipation of litigation? 21 A. And here's the problem, that is that I don't 22 know what he has on his phone because I don't know what 23 he -- what, if anything, would have been on the phone 24 at that time period. And the reason -- only reason why 25 I say that is I know that he's gotten new phones, so he</p>
<p>67</p> <p>1 A. No. 2 Q. Okay. One of the things you didn't review 3 for this deposition is any of the briefing on 4 plaintiffs' sanctions; correct? 5 A. I did not, no. 6 Q. Okay. So you don't know -- 7 A. There was a lot of documents on those. 8 Q. You don't know any of the issues that 9 plaintiffs raised in terms of why previous depositions 10 have been adequate in this case? 11 A. I know that there was an issue -- there were 12 issues related specifically to Ms. Karpova's deposition 13 and Mr. Dew's deposition, which was part of the reason 14 why I was retained. But aside from that, no. 15 Q. Okay. Like, in terms of specifically what 16 was wrong with those depositions, you're not really up 17 to speed on what we said about that; right? 18 A. I know that there were issues related to the 19 inability of Mr. Dew or Mr. -- Ms. Karpova, excuse me, 20 to testify intelligently as to the material and the 21 videos and the sourcing done for those videos, because 22 nobody had rewatched those videos. 23 So I made sure to undertake an effort to do 24 that. But as I indicated previously, I don't know that 25 it's really possible for a person to review every</p>	<p>69</p> <p>1 doesn't have access to anything that's on prior phones. 2 And then -- or he wouldn't have anything 3 that's for prior phones. I'm sure that if he -- well, 4 actually, I don't want to say that because I'm not 5 sure. But in any event, like I said, I don't know when 6 he would have gotten a new phone such that he would 7 have access to those messages anymore. 8 Q. You read Mr. Jones' November 2019 9 deposition? 10 A. I read the March 2019 deposition. I don't 11 think I got to the November one. 12 Q. Okay. Because, see, Mr. Jones testified 13 something totally opposite what you just said -- 14 A. Okay. 15 Q. -- which is that he got new phones, but they 16 have the same SIM card and offer Cloud storage and he 17 doesn't lose text messages. 18 A. Okay. 19 Q. Do you have any reason to dispute that? 20 A. No. 21 Q. Okay. And so are you aware that I possess a 22 text message that was sent to me from 2019 that says 23 Sandy Hook in it and discusses Sandy Hook sent by a New 24 York Times reporter. Do you know I have that message? 25 A. No, I don't.</p>



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<p>70</p> <p>1 Q. Okay.</p> <p>2 A. I haven't reviewed any text messages.</p> <p>3 Q. Okay. So in terms of why I have that message</p> <p>4 and why Mr. Jones didn't produce it or why it wasn't</p> <p>5 preserved, you don't know the answer to that question?</p> <p>6 A. I don't.</p> <p>7 Q. Okay. Can you summarize for me what the</p> <p>8 company knows about Neil Heslin?</p> <p>9 A. Could you be more specific?</p> <p>10 Q. No, not now. Can you summarize what the</p> <p>11 company does know? I mean, I -- let me put it this</p> <p>12 way. Neil -- company has no relationship with Neil</p> <p>13 Heslin; right?</p> <p>14 A. Correct.</p> <p>15 Q. Nobody at the company has ever met Neil</p> <p>16 Heslin?</p> <p>17 A. I don't believe so.</p> <p>18 Q. Doesn't -- doesn't transact any business with</p> <p>19 Neil Heslin?</p> <p>20 A. No.</p> <p>21 Q. Shouldn't have a ton of information about</p> <p>22 Neil Heslin; right?</p> <p>23 A. I don't know that that's accurate. I'm sure</p> <p>24 that in relationship to the litigation, certain</p> <p>25 documents may have been produced.</p>	<p>72</p> <p>1 that you haven't reviewed is the plaintiff submitted --</p> <p>2 wait. Hold on. Back up. Yeah. Okay. One of the</p> <p>3 things you haven't reviewed is the plaintiff has</p> <p>4 submitted various exhibits in support of his sanctions</p> <p>5 for Ms. Karpova's deposition. Did you know that?</p> <p>6 A. I didn't review that --</p> <p>7 Q. Okay.</p> <p>8 A. -- sanctions motion.</p> <p>9 Q. Okay.</p> <p>10 MR. BANKSTON: Do you have exhibit</p> <p>11 stickers? Okay. Can you mark this as 1 and give it to</p> <p>12 the witness.</p> <p>13 THE COURT REPORTER: Can you give me a</p> <p>14 moment to grab them.</p> <p>15 MR. BANKSTON: Absolutely. Not a</p> <p>16 problem at all.</p> <p>17 A. Thanks.</p> <p>18 Q. (BY MR. BANKSTON) All right. Ms. Paz, I</p> <p>19 have handed you what's been marked as Exhibit 1. Do</p> <p>20 you see this e-mail here from David Knight?</p> <p>21 (Exhibit No. 1 marked.)</p> <p>22 A. Yes.</p> <p>23 Q. (BY MR. BANKSTON) You understand who David</p> <p>24 Knight is?</p> <p>25 A. I believe that he was a former host.</p>
<p>71</p> <p>1 Q. I haven't produced anything.</p> <p>2 A. No, by the company. The company may have</p> <p>3 produced documents or my attorneys may have produced</p> <p>4 documents. I don't know.</p> <p>5 Q. That's what -- okay. You don't know what the</p> <p>6 company may have or may not have produced about Neil</p> <p>7 Heslin?</p> <p>8 A. Before or after the litigation?</p> <p>9 Q. Both.</p> <p>10 A. So before the litigation, I don't think that</p> <p>11 the company had many -- much, or if at all, information</p> <p>12 about Neil Heslin.</p> <p>13 Q. Okay. What about after?</p> <p>14 A. After, I'm aware that there was some</p> <p>15 information about some legal issues that he may or may</p> <p>16 not have had in Connecticut.</p> <p>17 Q. You mean after the lawsuit was filed,</p> <p>18 somebody went and found out about that?</p> <p>19 A. I -- I believe so.</p> <p>20 Q. Okay. Prior to this lawsuit --</p> <p>21 A. Uh-huh.</p> <p>22 Q. -- in terms of its Sandy Hook coverage, has</p> <p>23 the company ever done any research on Neil Heslin?</p> <p>24 A. I don't believe so.</p> <p>25 Q. Again, one of the things I want to make sure</p>	<p>73</p> <p>1 Q. Okay. Do you know why the night of June</p> <p>2 19th, 2017 might be important in this case?</p> <p>3 A. No.</p> <p>4 Q. Okay. That's the night that Mr. Heslin</p> <p>5 appeared on Megyn Kelly's show. Do you understand what</p> <p>6 that --</p> <p>7 A. Okay.</p> <p>8 Q. -- appearance was?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. So that's the night -- as the night</p> <p>11 that Mr. Heslin appeared on Megyn Kelly's show,</p> <p>12 Mr. Knight is e-mailing himself articles on</p> <p>13 Mr. Heslin's past, isn't he?</p> <p>14 A. That's what this document is.</p> <p>15 Q. Okay. Let me show you --</p> <p>16 MR. BANKSTON: Can you mark that as 2?</p> <p>17 Or I got it. Gave me some stickers.</p> <p>18 Q. (BY MR. BANKSTON) I mark that as Exhibit 2.</p> <p>19 That's also from the same day; right?</p> <p>20 (Exhibit No. 2 marked.)</p> <p>21 A. It's from the next day.</p> <p>22 Q. (BY MR. BANKSTON) Is that -- is that the</p> <p>23 20th?</p> <p>24 A. It's the 9th. One is the 18th and --</p> <p>25 Q. One is the 9th?</p>

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<p style="text-align: right;">74</p> <p>1 A. -- one is the 20th.</p> <p>2 Q. Okay.</p> <p>3 A. 19th, sorry.</p> <p>4 Q. 19th. Okay. And so this one is titled,</p> <p>5 Connecticut Carry releases the troubled past of Neil</p> <p>6 Heslin; right?</p> <p>7 A. It's a link to an article that -- or I'm</p> <p>8 assuming is an article. But that's what it says.</p> <p>9 Q. Well, I was actually talking about the</p> <p>10 subject line of the e-mail. That's what it's titled;</p> <p>11 right?</p> <p>12 A. Yes, I think that's the name of the story and</p> <p>13 the link that's in the body.</p> <p>14 Q. Probably the -- probably the headline of that</p> <p>15 story; right?</p> <p>16 A. Yes.</p> <p>17 Q. Okay.</p> <p>18 A. That's what it looks like.</p> <p>19 Q. So here we have Mr. Knight. Also, on the</p> <p>20 other e-mail that you're looking at, do you see a</p> <p>21 different e-mail address, seekthetruth?</p> <p>22 A. Are you talking about Exhibit 1?</p> <p>23 Q. Yes.</p> <p>24 A. Yes.</p> <p>25 Q. Okay. And that's also another InfoWars</p>	<p style="text-align: right;">76</p> <p>1 saying things that he wished they stop -- would stop</p> <p>2 saying. And then as the next thing that happens from</p> <p>3 Mr. Knight's point of view is he goes up and digs up</p> <p>4 dirt on Mr. Heslin; right? And that's what's happening</p> <p>5 here; right?</p> <p>6 A. I don't know that he dug it up. I think he</p> <p>7 sent himself an article.</p> <p>8 Q. You have no idea how he got it, do you?</p> <p>9 A. It says he sent it to himself.</p> <p>10 Q. Right. But where did he get the article?</p> <p>11 I mean, he put the -- I know that he put a link in an</p> <p>12 e-mail to himself and sent it to him. We don't know</p> <p>13 how he got that link, do we?</p> <p>14 A. I don't know how he got this link, no.</p> <p>15 Q. You haven't talked to Mr. Knight, have you?</p> <p>16 A. I have not spoken and he's not a current</p> <p>17 employee.</p> <p>18 Q. And you didn't even try, did you?</p> <p>19 A. I didn't try to talk to him, no.</p> <p>20 Q. Okay. And so this, interestingly enough, I</p> <p>21 asked Ms. Karpova this. And you read her deposition;</p> <p>22 right?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. I asked her the same question, has the</p> <p>25 company ever done any research on Neil Heslin. She</p>
<p style="text-align: right;">75</p> <p>1 employee; right?</p> <p>2 A. You know what, I'm not sure.</p> <p>3 Q. Okay. Do you know who Darrin McBreen is?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. So what we have here is contrary to</p> <p>6 what you had believed prior to this lawsuit, the</p> <p>7 company had indeed been conducting research on Neil</p> <p>8 Heslin?</p> <p>9 A. I don't think that that's an accurate</p> <p>10 statement. I think that as you represented, this is</p> <p>11 the day that he went on Megyn Kelly.</p> <p>12 Q. Uh-huh.</p> <p>13 A. So it would have been in -- in addressing</p> <p>14 that interview, which I believe that interview was</p> <p>15 directly -- directed at the company. Well, Mr. Jones,</p> <p>16 maybe, individually. But generally at the company.</p> <p>17 So I don't know that the -- the right way to</p> <p>18 describe what you see here is we were conducting</p> <p>19 research on an individual for no reason.</p> <p>20 Q. Oh, I'm not saying for no reason.</p> <p>21 A. Okay.</p> <p>22 Q. I a hundred percent know the reason.</p> <p>23 A. Okay.</p> <p>24 Q. Mr. Heslin got on Megyn Kelly's show and said</p> <p>25 some bad things about InfoWars. Said that InfoWars was</p>	<p style="text-align: right;">77</p> <p>1 told me the same thing, no, it's never done any</p> <p>2 research on Neil Heslin. And I told her,</p> <p>3 unfortunately, yes, it has.</p> <p>4 When -- when I -- when you read that, did you</p> <p>5 go try to find out if the company had ever done any</p> <p>6 research on Neil Heslin?</p> <p>7 A. I wouldn't consider this doing research on</p> <p>8 Neil Heslin.</p> <p>9 Q. Okay. Well, that's where we disagree. But</p> <p>10 in terms of -- did you go to try to find out if the</p> <p>11 company had ever tried to get any information or had</p> <p>12 been exchanging with itself any information about Neil</p> <p>13 Heslin?</p> <p>14 A. Aside from speaking to the individuals I've</p> <p>15 already said I spoke to and doing the searches on the</p> <p>16 Dropbox for the production, no.</p> <p>17 Q. Well, I mean, that's a good point; right? If</p> <p>18 you searched every document with Neil Heslin's name in</p> <p>19 it, these documents would have come up; right?</p> <p>20 A. I think I did see these.</p> <p>21 Q. Okay. Tell me all the sources of information</p> <p>22 for InfoWars' knowledge about Neil Heslin.</p> <p>23 A. I'm sorry, can you be more specific?</p> <p>24 Q. I can't, no. No. The company had got</p> <p>25 information about Neil Heslin, some of it which it put</p>

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<p>78</p> <p>1 out into the world on its videos. And I asked you to 2 get prepared on the company's knowledge of the 3 plaintiff. 4 A. Well -- 5 Q. I want to know all the sources of information 6 about knowledge of Neil Heslin. 7 A. Some of the documents that were returned in 8 my search were things that other people send to us. 9 Q. Uh-huh. 10 A. So, like, I'm sure you know that many of the 11 e-mails are thousands and thousands of e-mails from the 12 general public. Some of them send information to 13 InfoWars to general InfoWars mailboxes that may or may 14 not be monitored. I can't say whether that is in the 15 company's knowledge, because like I said, nobody was 16 really reviewing those with any regularity. 17 I see what you're saying that these obviously 18 were in David Knight's purview because he sent them to 19 himself. But aside from those, I didn't -- I don't 20 think that I saw anything else. I did see -- like I 21 said, there were some -- he had some legal issues in 22 Connecticut. 23 Q. Okay. Here's what I'm not understanding, is 24 InfoWars has made multiple videos about Neil Heslin; 25 right? I mean, they're being sued for two of them;</p>	<p>80</p> <p>1 particular video. And I think that that source came 2 from iBankCoin, if I'm not mistaken. Then the Megyn 3 Kelly interview. 4 Q. Okay. 5 A. I think I already said I was aware of his 6 legal issues in Connecticut, but that may have been 7 sourced from these articles. I'm not really sure what 8 the original source was for those, like, his legal 9 troubles in Connecticut. 10 Q. Okay. 11 A. And as far as documents I reviewed, I think 12 that's probably it. 13 Q. What about Mr. Fetzer? 14 A. Mr. Fetzer's book, you mean? 15 Q. Not necessarily. 16 A. Mr. Fetzer -- 17 Q. Anything from Mr. Fetzer about Mr. Heslin. 18 A. I don't think that Mr. Fetzer was very 19 involved with the company or with individuals inside 20 the company. And the reason why I say that is because 21 based on my conversations with Mr. Jones and 22 Mr. Watson, Mr. Fetzer was not really on friendly terms 23 with Mr. Jones. 24 Q. Okay. 25 A. And Mr. Jones' position is he really didn't</p>
<p>79</p> <p>1 right? 2 A. When you say multiple, I don't -- I don't 3 know -- 4 Q. I didn't -- 5 A. -- how many you're referring to. But I don't 6 know how -- I don't think that there are a lot of 7 videos specifically naming Neil Heslin. 8 Q. Okay. Well, let's just go with two. 9 A. Sure. 10 Q. All right? Let's talk about the two that 11 they're being sued for. 12 A. Yes. 13 Q. You know those two videos exist? 14 A. I do. 15 Q. You know there are sources of information 16 about Neil Heslin in those videos? 17 A. Yes. 18 Q. Where did it come from? 19 A. You mean where were they sourced from? 20 Q. Yeah. I want to know every piece of 21 information about Neil Heslin that the company put on 22 air. Where did it come from? 23 A. I know that Owen Shroyer's video was 24 specifically sourced from that article. I believe it 25 was from Zero Hedge. So that was a source of that</p>	<p>81</p> <p>1 use Fetzer as a source. So Mr. Jones' position is also 2 he didn't think he read the book that Mr. Fetzer has 3 produced. 4 Q. Here's -- 5 A. So whether or not it's in the company's 6 materials, it may be in the materials. But I don't 7 know that it was ever reviewed by anybody. I don't 8 know that it was ever in the company's purview in any 9 way. 10 Q. You watched Owen Shroyer's video, right, 11 about Neil Heslin? 12 A. Yes. 13 Q. That video quotes Mr. Fetzer. For the 14 sources in the claim, it quotes him; right? 15 A. You mean in the video regarding the Megyn 16 Kelly interview? 17 Q. Whether Mr. Heslin held his son or not. 18 Right. That all comes from Mr. Fetzer. It's quoted in 19 the video. Do you not know that? 20 A. No. The source of that video is the Zero 21 Hedge article that I just referenced. 22 Q. Actually -- 23 A. And so that may have been quoted from the 24 Zero -- Zero Hedge may have used that as a source. But 25 I'm not aware of Owen using that as a source.</p>

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<p style="text-align: right;">82</p> <p>1 Q. It's -- it's shown on, like, right -- that's</p> <p>2 the thing that's shown is, Mr. Fetzer says, blah, blah,</p> <p>3 blah.</p> <p>4 A. Right. But I think that the source that Owen</p> <p>5 got it from was Zero Hedge. Not from -- directly from</p> <p>6 Mr. Fetzer. Do you see what I'm saying?</p> <p>7 Q. Sure. I mean, we could just keep cycling --</p> <p>8 it could be iBankCoin gives it to Zero Hedge, give it</p> <p>9 to somebody, give it to somebody, give it to somebody.</p> <p>10 A. Right.</p> <p>11 Q. And then when you put the article in, it's</p> <p>12 Mr. Fetzer says X, Y, and Z.</p> <p>13 A. Right.</p> <p>14 Q. Mr. Fetzer's being quoted in that video;</p> <p>15 right?</p> <p>16 A. I think the only reason why he was quoted is</p> <p>17 because it was quoted in the original article. That</p> <p>18 was the source that Owen used. So I don't think</p> <p>19 that -- if you're asking me whether Owen went to</p> <p>20 Mr. Fetzer as a source or went and read his -- his book</p> <p>21 or went and read any independent research into</p> <p>22 Mr. Fetzer's information that he -- that he had</p> <p>23 available to him, I don't think that that is what</p> <p>24 happened.</p> <p>25 I think what happened was, as is typical in</p>	<p style="text-align: right;">84</p> <p>1 it accumulates articles from all kinds of different</p> <p>2 sources. So it's -- it's an accumulator.</p> <p>3 Q. All right. So who wrote the article on Zero</p> <p>4 Hedge? Where does it come from?</p> <p>5 A. That article --</p> <p>6 Q. Uh-huh.</p> <p>7 A. -- I believe, was originally sourced from</p> <p>8 iBankCoin.</p> <p>9 Q. Well, the article is written by Zero Point</p> <p>10 Now. Do you know what that is?</p> <p>11 A. No.</p> <p>12 Q. Okay. Does the company contend that</p> <p>13 Mr. Heslin is a gun regulation advocate?</p> <p>14 A. At what point in time?</p> <p>15 Q. Any time.</p> <p>16 A. I'm -- I'm not really sure how to answer</p> <p>17 that.</p> <p>18 Q. Okay. Okay. So the company does not know if</p> <p>19 Mr. Heslin is a gun control advocate, gun regulation --</p> <p>20 A. I'm not sure as I sit here today, no.</p> <p>21 Q. Okay. So if that is knowledge the company</p> <p>22 has about the plaintiff, you wouldn't be prepared to</p> <p>23 speak about it today?</p> <p>24 A. Right.</p> <p>25 Q. Okay. Got you. Are there any people from</p>
<p style="text-align: right;">83</p> <p>1 the company, is that he woke up that morning, there</p> <p>2 were source of a bunch of material that was produced to</p> <p>3 him that morning. That morning, that Zero Hedge</p> <p>4 article was produced and that was the entirety of the</p> <p>5 source material that he used to produce that video.</p> <p>6 Q. Right. So he gets the Zero Hedge article.</p> <p>7 A. Yes.</p> <p>8 Q. Somebody said, hey, you should look at this.</p> <p>9 He looks at this and he sees, Mr. Fetzer says blah,</p> <p>10 blah, blah.</p> <p>11 A. Uh-huh.</p> <p>12 Q. And he says, I'm going to put this on the</p> <p>13 air; right?</p> <p>14 A. The source in the Zero Hedge article?</p> <p>15 Q. Right.</p> <p>16 A. Whatever the source that Zero Hedge had</p> <p>17 produced?</p> <p>18 Q. Right. Because Zero Hedge is not a -- that's</p> <p>19 not a person; right?</p> <p>20 A. No.</p> <p>21 Q. That's a completely anonymous blog; right?</p> <p>22 A. I don't think it's a blog.</p> <p>23 Q. All right. I don't -- I don't know what else</p> <p>24 it would be. What else would it be?</p> <p>25 A. I think that the point of Zero Hedge is that</p>	<p style="text-align: right;">85</p> <p>1 whom the company received information about Scarlett</p> <p>2 Lewis?</p> <p>3 A. I'm sorry, can you repeat that?</p> <p>4 Q. Yeah. Are there any people from whom the</p> <p>5 company received information about Scarlett Lewis?</p> <p>6 A. I don't know. Do you have a document that</p> <p>7 you could show me?</p> <p>8 Q. I -- no. I -- I -- I mean, part of it is</p> <p>9 because I want to know what I haven't been shown.</p> <p>10 Because this -- this company has not at all cooperated</p> <p>11 in good faith in discovery. So part of the reason I</p> <p>12 have you here is for you to tell me. So has -- is</p> <p>13 there anybody the company's gotten information about</p> <p>14 Scarlett Lewis?</p> <p>15 A. I don't know. If you could show me a</p> <p>16 document, that would be helpful.</p> <p>17 Q. Well --</p> <p>18 A. But as far as my communications with people</p> <p>19 in the company and what I've done, my due diligence to</p> <p>20 testify here today, nobody has -- is aware of any aside</p> <p>21 from what's been produced.</p> <p>22 Q. Well, what do you mean, aside from what's</p> <p>23 been produced?</p> <p>24 A. If there's --</p> <p>25 Q. What has been produced?</p>

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<p style="text-align: right;">86</p> <p>1 A. If there's anything that's been produced. I</p> <p>2 don't think that there's anything regarding Ms. Lewis.</p> <p>3 Q. Okay.</p> <p>4 A. I have not -- I don't think I've seen</p> <p>5 anything.</p> <p>6 Q. Let me -- let's go back. Part of your job</p> <p>7 today was to get prepared on the company's knowledge of</p> <p>8 the plaintiff.</p> <p>9 A. Right.</p> <p>10 Q. Do you feel like you've done that for</p> <p>11 Scarlett Lewis?</p> <p>12 A. I feel like I have asked the employees what,</p> <p>13 if anything, they had for the plaintiffs. And their</p> <p>14 response to me was that they didn't have anything.</p> <p>15 Q. Okay. Have you read every document with</p> <p>16 Scarlett's name on it?</p> <p>17 A. I did a search --</p> <p>18 Q. Okay.</p> <p>19 A. -- in the Dropbox material that we have.</p> <p>20 Q. That's not what I'm asking, though. Did you</p> <p>21 read every document with Scarlett Lewis' name on it?</p> <p>22 A. I don't know that I've read every single</p> <p>23 document.</p> <p>24 Q. Okay. So you'll -- you'll concede to me</p> <p>25 sitting here today, there are -- there are -- there are</p>	<p style="text-align: right;">88</p> <p>1 Q. Wouldn't you think then, oh, maybe there are</p> <p>2 documents with Ms. Lewis' name on them?</p> <p>3 A. I mean, there may very well be missed</p> <p>4 documents, but that doesn't mean that it was in the</p> <p>5 company's knowledge. Many of those documents, after a</p> <p>6 certain point, were not being opened.</p> <p>7 Q. Okay. So from your standpoint, because you</p> <p>8 don't know whether certain documents were opened or</p> <p>9 not, you just ignored them?</p> <p>10 A. No, that's not correct.</p> <p>11 Q. Okay. So you knew the -- the company</p> <p>12 possessed documents with Scarlett Lewis' name on them;</p> <p>13 right? You knew that?</p> <p>14 A. Sure, there's some e-mails. But I don't know</p> <p>15 whether they were ever in the company's knowledge as</p> <p>16 far as information that was provided by an outside</p> <p>17 source. Mr. Halbig -- I know Mr. Halbig has sent a</p> <p>18 variety of e-mails and copied numerous, numerous</p> <p>19 people.</p> <p>20 They read like spam. And when I talk to</p> <p>21 various employees, their position is at a certain</p> <p>22 point, they stopped opening his e-mails.</p> <p>23 Q. Wonderful. When you say it's -- you're not</p> <p>24 sure if the documents we talked about in Ms. Karpova's</p> <p>25 deposition are in the company's knowledge, they're in</p>
<p style="text-align: right;">87</p> <p>1 possibly documents in this case that have even been</p> <p>2 produced that have Scarlett's name on them that you may</p> <p>3 have not read, that's what you're telling me?</p> <p>4 A. Perhaps.</p> <p>5 Q. Okay. So in other words, when you did a</p> <p>6 search of documents for Scarlett Lewis, were you</p> <p>7 searching the entire production? Did you have a</p> <p>8 capability to search the entire production?</p> <p>9 A. I have a capability of searching the</p> <p>10 production on our Dropbox. I -- I can -- I understand</p> <p>11 that there have been some issues regarding the various</p> <p>12 attorneys and what's been produced where. But it's my</p> <p>13 understanding that from the company's perspective,</p> <p>14 we've not ever used Ms. Lewis' name on the air.</p> <p>15 Q. Oh, I don't doubt that, no.</p> <p>16 A. So we don't have -- when I asked people what,</p> <p>17 if anything, they have -- have or produced on</p> <p>18 Ms. Lewis, and if they told me that they don't have</p> <p>19 anything, that makes sense to me because I don't think</p> <p>20 they've ever used her name.</p> <p>21 Q. Wouldn't it not make sense to you, though,</p> <p>22 after you read Ms. Karpova's deposition and you saw</p> <p>23 e-mails from Wolfgang Halbig directly harassing</p> <p>24 Ms. Lewis? Wouldn't--</p> <p>25 A. I think --</p>	<p style="text-align: right;">89</p> <p>1 the company's knowledge now, aren't they?</p> <p>2 A. Now, they are, yeah.</p> <p>3 Q. Right. Okay. So when I served you a notice</p> <p>4 of deposition for the company's knowledge of the</p> <p>5 plaintiffs, did you see a time limitation on that?</p> <p>6 A. No. I've reviewed a lot of e-mails.</p> <p>7 Q. Okay.</p> <p>8 A. I've seen some of the e-mails you're</p> <p>9 referring to. You mean the, like, the e-mails from</p> <p>10 Halbig to Ms. Lewis, Halbig to various other victims in</p> <p>11 the Sandy Hook --</p> <p>12 Q. Right.</p> <p>13 A. -- massacre? I've seen those e-mails.</p> <p>14 Q. That's -- okay. So going forward in this</p> <p>15 deposition, when I ask you stuff like, can you tell me</p> <p>16 the people who have provided information that now</p> <p>17 consist of the knowledge that the company has about</p> <p>18 this individual like Ms. Lewis --</p> <p>19 A. Uh-huh.</p> <p>20 Q. -- I -- I want you to tell me about documents</p> <p>21 like that that you know about instead of telling me</p> <p>22 that there aren't any documents. All right? What I</p> <p>23 want to know is other than Mr. Halbig, then, because</p> <p>24 you've seen that one now?</p> <p>25 A. Uh-huh.</p>

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<p>90</p> <p>1 Q. Where has the company gotten information 2 about Scarlett Lewis?</p> <p>3 A. As far as what's been -- what -- I guess I -- 4 I don't understand the question. So when you say where 5 we have gotten information from Scarlett Lewis, you 6 mean is this information that we have sourced on her? 7 Like, we've gone out into the world to try to find, or 8 this is just information that people are giving us at 9 any point in time?</p> <p>10 Q. Let's -- let's talk about what knowledge 11 means just for a minute. Because I want to make sure 12 you understand what this topic means. When this is the 13 -- the company's knowledge about the plaintiffs, you 14 would agree with me that there's various ways that a 15 company can acquire knowledge about an individual?</p> <p>16 A. Sure.</p> <p>17 Q. They can go get that knowledge and go out 18 and, like, go to the library and start looking stuff 19 up; right?</p> <p>20 A. Sure.</p> <p>21 Q. Somebody can send in an e-mail?</p> <p>22 A. Sure.</p> <p>23 Q. Somebody can watch a video?</p> <p>24 A. You mean if I went out and I -- and I saw a 25 video and then I brought -- and I was, like, okay.</p>	<p>92</p> <p>1 from that, I don't think the company did any research 2 into Ms. Lewis.</p> <p>3 Q. I'm not asking if they did research. We just 4 talked about that.</p> <p>5 A. Uh-huh.</p> <p>6 Q. We literally just talked about that. I'm 7 asking, any other individuals other than Mr. Halbig has 8 ever given the company any information?</p> <p>9 A. I don't know how to answer that, sir. Random 10 people could have sent the e-mails into the e-mail 11 server.</p> <p>12 Q. Absolutely, they could have.</p> <p>13 A. Random people from all over the world could 14 have done that.</p> <p>15 Q. They absolutely could have.</p> <p>16 A. And I don't know the -- I don't know how to 17 answer that.</p> <p>18 Q. But the company does?</p> <p>19 A. I can't manage -- I -- the company cannot 20 name every -- a name, specific names of the people who 21 have sent e-mails.</p> <p>22 Q. Why not? Why can't it do that?</p> <p>23 A. Why can't I here tell you of random names of 24 people that may have sent e-mails?</p> <p>25 Q. Sure. You could have written them down,</p>
<p>91</p> <p>1 Here's a video of Ms. Lewis --</p> <p>2 Q. Sure.</p> <p>3 A. -- here's a video of Ms. Heslin? Sure.</p> <p>4 Q. Yeah. The company -- somebody outside the 5 company could have a phone call with the company and 6 tell them something about Ms. Lewis?</p> <p>7 A. Sure.</p> <p>8 Q. Tons of different ways we can get information 9 about Ms. Lewis.</p> <p>10 A. Sure.</p> <p>11 Q. I want to know about all of them.</p> <p>12 A. Okay.</p> <p>13 Q. So when I say, where did the company get any 14 information that it currently possesses about Ms. Lewis 15 and any knowledge that it has about Ms. Lewis, I want 16 to know everybody. Where did it get that information?</p> <p>17 A. Aside from what we see in the e-mails, I 18 think that the company only has information that has 19 been provided to them through outside sources. But 20 like I said, I don't know that anybody really paid any 21 attention to it.</p> <p>22 Q. Okay. Outside what we see in the e-mails, 23 what do we see in the e-mails?</p> <p>24 A. The e-mails that we were talking about 25 earlier about Mr. Halbig sending her e-mails. Aside</p>	<p>93</p> <p>1 couldn't you? It's not -- it's not physically 2 impossible at all, is it?</p> <p>3 A. I did not do that.</p> <p>4 Q. Okay. You see what I've marked as Exhibit 3? 5 (Exhibit No. 3 marked.)</p> <p>6 A. Yes.</p> <p>7 Q. (BY MR. BANKSTON) You see it has FSSTX04 -- 8 I'm sorry. 043896?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. That's a company that's been produced 11 out of the company's corporate files?</p> <p>12 A. It appears to be.</p> <p>13 Q. Why does the company have this? What is 14 this?</p> <p>15 A. I don't know.</p> <p>16 Q. Okay. This is -- do you know who this is 17 pictures of?</p> <p>18 A. No.</p> <p>19 Q. Okay. That's -- that's Scarlett Lewis. Do 20 you recognize where this top picture was taken? Do you 21 understand what this picture is?</p> <p>22 A. You mean the top right-hand corner?</p> <p>23 Q. I'm sorry, no. In the top left.</p> <p>24 A. The top left-hand corner?</p> <p>25 Q. Uh-huh. Do you know where that's taken?</p>

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<p>94</p> <p>1 A. No, sir.</p> <p>2 Q. Okay.</p> <p>3 A. I don't know how the company came into</p> <p>4 possession of this.</p> <p>5 Q. Do you know about the -- about Scarlett Lewis</p> <p>6 and the coffee? Do you understand what I mean when</p> <p>7 I talk about Scarlett Lewis and the coffee?</p> <p>8 A. I believe that I read somewhere that there</p> <p>9 was something about Ms. Lewis or someone connected to</p> <p>10 Ms. Lewis going to get coffee for some people that were</p> <p>11 on scene of the shooting that day.</p> <p>12 Q. All right. So that's some knowledge that</p> <p>13 somebody gave the company about Ms. Lewis; right? Or</p> <p>14 at least that it thinks that it has about Ms. Lewis;</p> <p>15 right?</p> <p>16 A. I think that that was in the news cycle</p> <p>17 around that time. So --</p> <p>18 Q. Okay.</p> <p>19 A. -- I think that that's what the source of</p> <p>20 that information was.</p> <p>21 Q. Maybe it could be the e-mail where Wolfgang</p> <p>22 Halbig was harassing Ms. Lewis. Could it maybe be</p> <p>23 that?</p> <p>24 A. Like I said, I don't know that anybody had</p> <p>25 ever read that e-mail.</p>	<p>96</p> <p>1 Q. Okay. So it very well could have been --</p> <p>2 happened before he got on the show?</p> <p>3 A. I don't know.</p> <p>4 Q. Or during the time he was on the show?</p> <p>5 A. He was on the show for a pretty discrete</p> <p>6 period of time.</p> <p>7 Q. What time do you think that is?</p> <p>8 A. He came into the company's purview in early</p> <p>9 2014 and then he appeared on the show through mid to</p> <p>10 late 2015. And then he hadn't been on the show.</p> <p>11 Q. Okay. And then the information that</p> <p>12 Mr. Halbig gave the company, you understand that</p> <p>13 Mr. Halbig gave the company various claims about Sandy</p> <p>14 Hook that he said were true?</p> <p>15 A. You mean his 16 points?</p> <p>16 Q. A lot more than that, but sure.</p> <p>17 A. He keeps -- he adds to them periodically.</p> <p>18 But if that's what you're referring to, yes, I'm aware</p> <p>19 of them.</p> <p>20 Q. Okay. And the company kept broadcasting that</p> <p>21 well into 2017?</p> <p>22 A. I don't know that I would agree with the --</p> <p>23 with broadcasting. Can --</p> <p>24 Q. We'll talk about that later.</p> <p>25 A. Sure.</p>
<p>95</p> <p>1 Q. Did you check?</p> <p>2 A. Did I check about that specific e-mail?</p> <p>3 Q. Uh-huh.</p> <p>4 A. No.</p> <p>5 Q. Okay.</p> <p>6 A. Generally --</p> <p>7 Q. So in terms of whether the company was aware</p> <p>8 that Wolfgang Halbig was harassing Ms. Lewis, you don't</p> <p>9 know?</p> <p>10 A. As far as a time period, I know that after --</p> <p>11 I'm sorry. So let me just go back. When I spoke to</p> <p>12 Nico about Mr. Halbig and his communications with</p> <p>13 Mr. Halbig, getting him on the show and things like</p> <p>14 that, pretty much, he -- his point of view that he</p> <p>15 stopped looking at Mr. Halbig's e-mails after he</p> <p>16 stopped coming on the show.</p> <p>17 So -- and then Rob Dew was reading the</p> <p>18 generalized e-mail boxes for a period of time and then</p> <p>19 stopped because it was taking up too much time. So I</p> <p>20 can't say after the time period he stopped appearing on</p> <p>21 the show, whether anybody was reading his e-mails</p> <p>22 anymore.</p> <p>23 Q. Do you -- and you can't say when he was</p> <p>24 harassing Ms. Lewis, can you?</p> <p>25 A. I don't know that, no.</p>	<p>97</p> <p>1 Q. Okay. Let's -- let's put a pin in what</p> <p>2 InfoWars may have been doing in videos in 2017. We'll</p> <p>3 come back that.</p> <p>4 A. Sure.</p> <p>5 Q. Do you -- does the company contend Ms. Lewis</p> <p>6 is a gun regulation advocate?</p> <p>7 A. I think Ms. Lewis operates a nonprofit</p> <p>8 organization. I believe I did read some material in</p> <p>9 the disclosure in the discovery materials that she</p> <p>10 operates a nonprofit for school safety.</p> <p>11 Q. Does it have anything to do with guns?</p> <p>12 A. I guess that depends on what guns -- what</p> <p>13 school safety means.</p> <p>14 Q. And you don't know, do you? You don't know</p> <p>15 what the Jesse Lewis Choose Love Movement does or</p> <p>16 advocates, do you?</p> <p>17 A. I don't know what she says it advocates for,</p> <p>18 but I know that there are different interpretations as</p> <p>19 to what school safety means.</p> <p>20 Q. Okay. I just to want put this really clear,</p> <p>21 because --</p> <p>22 A. Sure.</p> <p>23 Q. -- you seem to -- you seem to be trying to</p> <p>24 insinuate that there's a potential interpretation of</p> <p>25 Ms. Lewis' charity that it is gun regulation related in</p>

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<p>98</p> <p>1 some way. Is that accurate?</p> <p>2 A. I don't know. But what I'm saying is she</p> <p>3 operates a nonprofit. That nonprofit has a goal and a</p> <p>4 stated directive. And however anyone wants to</p> <p>5 interpret that is a matter of opinion. But she</p> <p>6 operates a nonprofit charity.</p> <p>7 Q. I -- I get that. Does the company contend</p> <p>8 she's a gun regulation advocate?</p> <p>9 A. I guess that depends on someone's definition</p> <p>10 of what school safety means.</p> <p>11 Q. That's why I'm asking what the company</p> <p>12 contends. Does the company contend that she is a gun</p> <p>13 --</p> <p>14 A. She could be, depending on someone's opinion.</p> <p>15 Q. I'm not asking someone's opinion. I'm asking</p> <p>16 the company's opinion. Does the company contend she's</p> <p>17 a gun regulation advocate?</p> <p>18 A. She could be.</p> <p>19 Q. I'm not asking if she could or might be, who</p> <p>20 knows, whatever, I don't want -- I want, does the</p> <p>21 company contend that she is?</p> <p>22 A. In the opinion of individual people that work</p> <p>23 for the company, she could be. That's my response.</p> <p>24 Q. So they -- it does -- they don't know, is</p> <p>25 what you're saying?</p>	<p>100</p> <p>1 A. So, I mean, personally, am I sitting here</p> <p>2 today saying that she's a gun control advocate? No.</p> <p>3 But what I'm saying is I think that the hosts and</p> <p>4 writers at InfoWars in their opinion could interpret</p> <p>5 that as being gun control advocacy.</p> <p>6 Q. Do they?</p> <p>7 A. Individually, as individual writers and</p> <p>8 individual hosts? I can't testify as to what they</p> <p>9 think.</p> <p>10 Q. All right. Let's just testify, then, to what</p> <p>11 the company thinks.</p> <p>12 A. Sure.</p> <p>13 Q. Is she a gun control advocate? Does -- does</p> <p>14 the company contend that? Before you answer that, you</p> <p>15 understand I'm going to trial. I need to discover what</p> <p>16 the company is or is not going to argue about these</p> <p>17 plaintiffs. What knowledge it has, what its</p> <p>18 contentions are.</p> <p>19 I think it's fair, don't you think, that if</p> <p>20 the company is going to contend Scarlett Lewis is a gun</p> <p>21 advocate, I get to know that; right?</p> <p>22 A. I think it is a reasonable interpretation of</p> <p>23 the nonprofit that she could be a gun control advocate.</p> <p>24 And if a host or a writer wanted to argue that from</p> <p>25 that angle, I think it's a reasonable interpretation of</p>
<p>99</p> <p>1 A. That's not what I'm saying.</p> <p>2 Q. Well, could does not imply knowledge.</p> <p>3 A. What I'm saying is, is that there are</p> <p>4 different people there that work there that have their</p> <p>5 own individual opinions. And the company -- the</p> <p>6 company isn't a person; right? So --</p> <p>7 Q. It needs to have opinions, though. And you</p> <p>8 need to testify to it.</p> <p>9 A. That's a murky area. And the reason why I</p> <p>10 think that's a murky area is because these are</p> <p>11 individuals. They have their own specific opinions.</p> <p>12 Everybody's opinions are different. Like, so for</p> <p>13 example, there are people within the company that are</p> <p>14 way more into or have bigger or -- I don't want to say</p> <p>15 bigger opinions, but have more opinions on Sandy Hook</p> <p>16 than others; right?</p> <p>17 So we could agree that one person employee at</p> <p>18 the company may not be as interested as somebody else</p> <p>19 in the company.</p> <p>20 Q. Okay.</p> <p>21 A. One person may want to cover a certain angle</p> <p>22 of Sandy Hook that another person may not want to</p> <p>23 cover. That is within their discretion and their</p> <p>24 opinions as writers and as hosts.</p> <p>25 Q. Sure.</p>	<p>101</p> <p>1 that activity.</p> <p>2 Q. Of -- of the activity of her charity?</p> <p>3 A. Yes.</p> <p>4 Q. Teaching emotional intelligence to children</p> <p>5 in schools?</p> <p>6 A. If that's what it does.</p> <p>7 Q. Okay. So first of all, let's start here.</p> <p>8 You have no idea what Ms. Scarlett Lewis' charity does;</p> <p>9 right?</p> <p>10 A. I have not done any independent research on</p> <p>11 her charity.</p> <p>12 Q. Okay. So in terms of asking what the company</p> <p>13 contends Ms. Scarlett Lewis does with her charity, in</p> <p>14 terms of what its advocacy is, company has no</p> <p>15 information; right?</p> <p>16 A. I know what she says it does.</p> <p>17 Q. Okay. What does the company know that</p> <p>18 Ms. Lewis says it does?</p> <p>19 A. What she says it does is advocate for --</p> <p>20 advocate for safe space for children to express</p> <p>21 themselves emotionally.</p> <p>22 Q. Okay. How could that be gun control</p> <p>23 advocacy?</p> <p>24 A. Like I said, it depends on the opinion of the</p> <p>25 person.</p>



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<p style="text-align: right;">102</p> <p>1 Q. And you were the one who said it could be.</p> <p>2 A. It could be.</p> <p>3 Q. So tell me -- tell me how.</p> <p>4 A. How -- how can school safety be construed as</p> <p>5 gun control advocacy?</p> <p>6 Q. Teaching children emotional things. How does</p> <p>7 that --</p> <p>8 A. If that's in fact what it does, I don't know.</p> <p>9 Q. You're the one who just told me --</p> <p>10 A. No.</p> <p>11 Q. -- that you said that --</p> <p>12 A. What I --</p> <p>13 Q. -- that's what she did.</p> <p>14 A. What I told you, that is what she says her</p> <p>15 company does. I don't know whether that is an actual</p> <p>16 statement of fact.</p> <p>17 Q. There might be something surreptitious that</p> <p>18 Scarlett Lewis is actually after? She might not be</p> <p>19 telling the truth about what her charity -- that's the</p> <p>20 point?</p> <p>21 A. I don't know. I haven't done any research</p> <p>22 into her company.</p> <p>23 Q. Right. Okay. Okay. Got you. Got you.</p> <p>24 Now, I get it. I'm sorry. I was -- I was having</p> <p>25 trouble because I was thinking that the company's</p>	<p style="text-align: right;">104</p> <p>1 Q. (BY MR. BANKSTON) Ms. Lewis' charity, the</p> <p>2 Jesse Love -- excuse me. Ms. Lewis' charity, the Jesse</p> <p>3 Lewis Choose Love Movement, did you review any</p> <p>4 documents about that organization?</p> <p>5 A. No.</p> <p>6 Q. Okay. Well, let me -- okay. When I talk</p> <p>7 about H-O-N-R --</p> <p>8 A. Yes.</p> <p>9 Q. -- HONR. You know what that is?</p> <p>10 A. Yes.</p> <p>11 Q. What does the company -- what does the</p> <p>12 company believe that is?</p> <p>13 A. I believe that's a company that is run by</p> <p>14 Mr. Pozner. And the goal of that company is to take --</p> <p>15 what it believes is misinformation off of the Internet.</p> <p>16 Q. Okay. Let me just correct you going forward.</p> <p>17 Just so you'll know going forward, it's Pozner.</p> <p>18 Mr. Pozner.</p> <p>19 A. Okay.</p> <p>20 Q. Okay. The company agrees that it has</p> <p>21 publicized information about Mr. Pozner and HONR;</p> <p>22 right?</p> <p>23 A. About Mr. Pozner individually, or --</p> <p>24 Q. Sure. And HONR. Both of them.</p> <p>25 A. I agree that the company has published</p>
<p style="text-align: right;">103</p> <p>1 knowledge about what Ms. Lewis does, you were taking</p> <p>2 Ms. Lewis at her word. But because the company can't</p> <p>3 verify that and has done nothing to verify that, you</p> <p>4 can't say?</p> <p>5 A. That's right.</p> <p>6 Q. Got you. All right.</p> <p>7 A. Is this a good time for --</p> <p>8 Q. Yeah, you can get a --</p> <p>9 A. Oh, you have water. Oh, no. I'm just -- I</p> <p>10 would just like another water.</p> <p>11 MS. BLOTT: Can we take a --</p> <p>12 Q. (BY MR. BANKSTON) Yeah, you need a -- well,</p> <p>13 hold on.</p> <p>14 A. Yeah. Can we take a -- a potty break too,</p> <p>15 because --</p> <p>16 Q. Yeah, because we got a good -- we -- this --</p> <p>17 this will work.</p> <p>18 A. Is this a good break?</p> <p>19 Q. This is fine, yeah. I had a few things I</p> <p>20 wanted to ask you, but I'm not going to push them.</p> <p>21 THE VIDEOGRAPHER: 10:38 off the</p> <p>22 record.</p> <p>23 (Recess from 10:38 a.m. to 10:50 a.m.)</p> <p>24 THE VIDEOGRAPHER: We are on the</p> <p>25 record at 10:49.</p>	<p style="text-align: right;">105</p> <p>1 information about HONR and it may be Mr. Pozner in</p> <p>2 connection with his relationship with HONR.</p> <p>3 Q. Well, it's published things from Mr. Pozner;</p> <p>4 right? Not HONR. Like Mr. Pozner's e-mail address,</p> <p>5 he's put that on air; right?</p> <p>6 A. As far as its connection to HONR, I believe</p> <p>7 so, yes.</p> <p>8 Q. No, lenpozner@gmail.com.</p> <p>9 A. You mean his personal e-mail address?</p> <p>10 Q. Uh-huh.</p> <p>11 A. Perhaps, I'm not sure.</p> <p>12 Q. Well, you've watched that episode; right?</p> <p>13 You know what I'm talking about?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. The company agrees its employees</p> <p>16 researched business filings related to Mr. Pozner?</p> <p>17 A. Are you referring to a background check?</p> <p>18 Q. No.</p> <p>19 A. Okay. I don't know that there was any</p> <p>20 independent research done as far as the company. I</p> <p>21 know that there was a discussion about the P.O.box at</p> <p>22 U-Haul that was associated with the company. I don't</p> <p>23 -- I don't remember seeing any records relating to the</p> <p>24 filings of the company.</p> <p>25 Q. You've read all the articles that were</p>

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<p>106</p> <p>1 produced; right? You taught me that?</p> <p>2 A. Yes, I've read -- I've read the articles.</p> <p>3 Q. So you've read the articles the company wrote</p> <p>4 about Leonard Pozner?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. And in those -- in those -- there's</p> <p>7 article that links to his business filing; right?</p> <p>8 A. Okay. I don't remember.</p> <p>9 Q. You wouldn't dispute that, though? You don't</p> <p>10 know what I'm talking about?</p> <p>11 A. I don't remember.</p> <p>12 Q. Okay. You understand what I mean when I talk</p> <p>13 about Independent Media Solidarity?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Can you describe to me what</p> <p>16 Independent Media -- Independent Media Solidarity,</p> <p>17 sometimes called IMS, can you describe to me what that</p> <p>18 is?</p> <p>19 A. I'm aware that there was a documentary that</p> <p>20 was produced by that company. I don't know if I would</p> <p>21 call them a company, but they're a loosely collected</p> <p>22 group of individuals that produced a documentary about</p> <p>23 Sandy Hook. I believe that was sometime in early 2014.</p> <p>24 And then that Rob Dew, I think, did a -- did a show</p> <p>25 interviewing anonymously the people that were involved</p>	<p>108</p> <p>1 A. Who, Independent Media Solidarity?</p> <p>2 Q. Uh-huh. Yeah, guests.</p> <p>3 A. They were guests on that video?</p> <p>4 Q. Uh-huh.</p> <p>5 A. I don't recall, I'm sorry.</p> <p>6 Q. Giving out information about Mr. Pozner, you</p> <p>7 don't remember that?</p> <p>8 A. That IMS did?</p> <p>9 Q. Uh-huh.</p> <p>10 A. I don't recall.</p> <p>11 Q. Okay. So I take it you haven't tried to talk</p> <p>12 to those people?</p> <p>13 A. No, I did not.</p> <p>14 Q. All right.</p> <p>15 A. Those people are not associated with the</p> <p>16 company.</p> <p>17 Q. I get that. I -- believe me, I understand</p> <p>18 that. What I'm saying is those people -- let's put it</p> <p>19 this way. If those people were quoted in the February</p> <p>20 12th, 2015 video that's in plaintiffs' petition, if</p> <p>21 that is the case that they are quoted in there and</p> <p>22 talking there and provide information about Mr. Pozner,</p> <p>23 whatever they had to say, you -- you don't know right</p> <p>24 now; right?</p> <p>25 A. No, I don't know.</p>
<p>107</p> <p>1 in that production.</p> <p>2 Q. Okay. That film, just for your reference,</p> <p>3 that's We Need to Talk About Sandy Hook.</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And you've read the articles about</p> <p>6 that film?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. You understand that that's the source</p> <p>9 of the controversy between Mr. Pozner and -- and the</p> <p>10 company in terms of YouTube strikes?</p> <p>11 A. Sure.</p> <p>12 Q. Okay. You would agree with me that it</p> <p>13 regards the sourcing of the videos in plaintiffs'</p> <p>14 petition, IMS was a source for some of InfoWars' Sandy</p> <p>15 Hook coverage?</p> <p>16 A. Which videos?</p> <p>17 Q. You tell me. Any of them, were they a source</p> <p>18 for any of them?</p> <p>19 A. No. I think the only real source for the</p> <p>20 video -- any of the videos was that -- that video that</p> <p>21 Rob Dew did interviewing Independent Media Solidarity.</p> <p>22 Q. All right. Well, you know the video we were</p> <p>23 talking about with the PO box and the addresses?</p> <p>24 A. Sure.</p> <p>25 Q. Okay. They're on that video too; right?</p>	<p>109</p> <p>1 Q. Okay.</p> <p>2 A. I mean, whatever they had to say, that was</p> <p>3 their sourcing. So we were just reporting on their</p> <p>4 sourcing.</p> <p>5 Q. I get it. Okay. So in terms -- so if those</p> <p>6 people are quoted and appeared and talked and gave</p> <p>7 information about Mr. Pozner in the February 12th, 2015</p> <p>8 video, one thing we can agree with is you haven't</p> <p>9 spoken, then, to everybody who was quoted in that video</p> <p>10 if they did appear; right?</p> <p>11 A. No, I didn't talk to the people quoted in the</p> <p>12 video.</p> <p>13 Q. Okay. You're familiar, then -- the article</p> <p>14 I'm actually referring to, maybe this will help us with</p> <p>15 our timeline. You had said early 2014. I actually</p> <p>16 know there's a December 9th, 2014 article called</p> <p>17 Internet Censors the Viral Sandy Hook Truth</p> <p>18 Documentary. So would you agree with me that this is</p> <p>19 probably the end of 2014?</p> <p>20 A. 2024 or 2015? I'm sorry.</p> <p>21 Q. 2014. Right, that's when the video was</p> <p>22 hosted by InfoWars?</p> <p>23 A. I can check my notes on that, but I thought</p> <p>24 it was in the beginning of 2014, Rob Dew did a We Need</p> <p>25 to Talk About Sandy Hook segment, which was the title</p>

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<p>110</p> <p>1 of the documentary.</p> <p>2 Q. Maybe on the next break, check your notes to</p> <p>3 refresh your timeline.</p> <p>4 A. Sure. Sure.</p> <p>5 Q. Because it was December 9th, 2014.</p> <p>6 A. Okay.</p> <p>7 Q. And you -- you have an awareness that the</p> <p>8 company actually hosted that video for distribution;</p> <p>9 right?</p> <p>10 A. What do you mean by hosted it for</p> <p>11 distribution?</p> <p>12 Q. Like, it has a YouTube channel, company does;</p> <p>13 right?</p> <p>14 A. It did.</p> <p>15 Q. Okay. And at that time, the company hosted</p> <p>16 that video?</p> <p>17 A. You mean it --</p> <p>18 MS. BLOTT: I apologize. The company,</p> <p>19 are you talking about Free Speech Systems, or --</p> <p>20 MR. BANKSTON: What other company</p> <p>21 would I be talking about? She's here to testify for</p> <p>22 them. Yes, I'm talking about Free Speech Systems.</p> <p>23 MS. BLOTT: Thank you.</p> <p>24 A. So you mean it republished the documentary on</p> <p>25 our YouTube channel?</p>	<p>112</p> <p>1 raised in his petition. But what I guess I'm having a</p> <p>2 problem with is the terminology you're using, is</p> <p>3 agreeing to host it. So what the company does is takes</p> <p>4 a piece of information that is in the media and it will</p> <p>5 see what is newsworthy.</p> <p>6 And the position, or in the case of</p> <p>7 Independent Media Solidarity, this video had been</p> <p>8 viewed many millions of times and it came to the</p> <p>9 company's attention because of how many views it was</p> <p>10 getting. And so that's how it came into the purview of</p> <p>11 the company to begin with.</p> <p>12 And then once it comes into the company's</p> <p>13 purview, what will happen is they will want, you know,</p> <p>14 whoever, whatever host it was, in this case, it was Rob</p> <p>15 Dew, will want to do a segment on it. And then will</p> <p>16 publish how to get access to the information to the</p> <p>17 viewership. So that's the only problem I'm having is</p> <p>18 just your terminology.</p> <p>19 Q. Saying hosting?</p> <p>20 A. Yes.</p> <p>21 Q. All right. Okay. Got you. Definitely got</p> <p>22 you. All right. So what I want to do is I want to</p> <p>23 show you a document. But unfortunately, the way it's</p> <p>24 been produced makes it pretty unreadable on this page.</p> <p>25 So I'm going to enter this into the record and then I'm</p>
<p>111</p> <p>1 Q. (BY MR. BANKSTON) I'm saying, yeah, it was</p> <p>2 --</p> <p>3 A. Is that what you mean?</p> <p>4 Q. I mean, it was a source for distribution was</p> <p>5 that it was hosted on the InfoWars YouTube page;</p> <p>6 correct? I mean --</p> <p>7 A. I know that there were links to -- and -- and</p> <p>8 this is common whenever the company covers a story or</p> <p>9 pieces of information, that what they will do is will</p> <p>10 link to that source. So that makes sense that it would</p> <p>11 be linked to our articles, it would be -- it would have</p> <p>12 been published in Mr. Dew's broadcast to show them, the</p> <p>13 viewership, the source of the material. So --</p> <p>14 Q. That's not what I mean, actually.</p> <p>15 A. Okay.</p> <p>16 Q. What I mean is that Independent Media</p> <p>17 Solidarity was having some trouble keeping its video up</p> <p>18 online. And InfoWars agreed to distribute and host the</p> <p>19 video on its own YouTube page. Do you understand that?</p> <p>20 A. I don't know that.</p> <p>21 Q. Okay. And that was the first copyright</p> <p>22 strike that Mr. Pozner got against the company. That</p> <p>23 was -- that was where that all started. You didn't</p> <p>24 understand that that was the first YouTube strike?</p> <p>25 A. I understand that that is an issue that he's</p>	<p>113</p> <p>1 going to show it to you electronically. Do you</p> <p>2 understand what I mean?</p> <p>3 A. Yes.</p> <p>4 Q. You see, because here's an article. And</p> <p>5 unless you've got a really good magnifying glass, you</p> <p>6 are not going to be able to read this.</p> <p>7 A. I'm not going to be able to see it.</p> <p>8 Q. Okay. So what we're going to do is we're</p> <p>9 going to put this in the record and then hopefully,</p> <p>10 we're going to be able to get to the court reporter a</p> <p>11 much more readable copy of this. But luckily, this is</p> <p>12 a video that -- I mean, an article that's produced that</p> <p>13 we all have.</p> <p>14 So here's the copy. You'll be able to see</p> <p>15 the headline. And I just want to show you just the</p> <p>16 beginning of this article. So first, I'm going to mark</p> <p>17 this as Exhibit 4. And can you look at that and you</p> <p>18 can see the headline, right, you can read that part of</p> <p>19 it?</p> <p>20 (Exhibit No. 4 marked.)</p> <p>21 A. Yes, I can see the headline.</p> <p>22 Q. (BY MR. BANKSTON) Okay. Okay. And that</p> <p>23 headline is Internet Censors Viral Sandy Hook Truth</p> <p>24 Documentary?</p> <p>25 A. Yes.</p>

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<p>114</p> <p>1 Q. Okay. Now, I'm going to show this to you</p> <p>2 electronically and I'm going to give you my screen here</p> <p>3 because it's a touch screen, so you can just scroll it.</p> <p>4 Okay? And I'm just going to come over here so I can</p> <p>5 show it to you. And you see this is the same article?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Now, what I want to show you here is</p> <p>8 if we go down here, and I want to read these first few</p> <p>9 paragraphs. And I'm going to read these to you. Okay?</p> <p>10 And you can tell me if I read them correctly. "Last</p> <p>11 Monday, an organization known as the Independent Media</p> <p>12 Solidarity released an epic documentary entitled We</p> <p>13 Need to Talk About Sandy Hook, which they hosted on</p> <p>14 their own site, as well as YouTube.</p> <p>15 Within hours of the video's upload, it was</p> <p>16 well on its way to going viral. However, its success</p> <p>17 was short-lived. Shortly after InfoWars began hosting</p> <p>18 the video, the following Tuesday morning, it was</p> <p>19 suddenly removed from YouTube due to a copyright claim</p> <p>20 by Lenny Pozner." I read all that correctly?</p> <p>21 A. Yes.</p> <p>22 Q. All right. So while you may have a problem</p> <p>23 with my terminology of InfoWars hosting the video,</p> <p>24 InfoWars doesn't have a problem with that terminology;</p> <p>25 correct?</p>	<p>116</p> <p>1 the children supposedly killed at Sandy Hook and is an</p> <p>2 outspoken critic of people who claim the shooting to be</p> <p>3 a staged event. It is..." -- oh, you want me to stop.</p> <p>4 Q. Yeah. So that first sentence there where it</p> <p>5 says that Pozner is reportedly a parent of a child who</p> <p>6 supposedly died at Sandy Hook.</p> <p>7 A. Yes.</p> <p>8 Q. Company now admits there's no reason to say</p> <p>9 that? He is a parent of a child who died at Sandy</p> <p>10 Hook?</p> <p>11 A. That's correct.</p> <p>12 Q. Okay. Can you keep going through the article</p> <p>13 here.</p> <p>14 A. "It is noted in the documentary that he is</p> <p>15 also the chairman and CEO of Traxware, a company that</p> <p>16 specializes in the removal of Internet slander,</p> <p>17 Internet defamation, mug shots, defamations of</p> <p>18 character, and online public records.</p> <p>19 This guy's -- quote, this guy's company would</p> <p>20 come in handy to any Sandy Hook hoax perpetrators with</p> <p>21 prior convictions, YouTube researcher MrStosh314 states</p> <p>22 in the film. Quote, he would ultimately remove any</p> <p>23 negative associations from the Internet.</p> <p>24 Could he be hanging around online bloggers</p> <p>25 and researchers for the purpose of protecting the Sandy</p>
<p>115</p> <p>1 A. So this article was written by Mr. Salazar.</p> <p>2 Q. Okay.</p> <p>3 A. So Mr. Salazar, that's the terminology that</p> <p>4 he used. I don't know that the company would</p> <p>5 necessarily endorse that terminology, but --</p> <p>6 Q. Well, it published this, didn't it?</p> <p>7 A. It did publish this, yes.</p> <p>8 Q. Okay. So I want to read a little more of</p> <p>9 this article. Okay?</p> <p>10 A. Sure.</p> <p>11 Q. And I want -- right here, we have some areas.</p> <p>12 And you see how there's some highlighted areas?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. What it basically is, is that any time</p> <p>15 that there's a highlighted area in a sentence, that I</p> <p>16 would like you to stop at the end of the highlight</p> <p>17 because I want to ask you a question about it. But do</p> <p>18 you think you could read us what we see here in the</p> <p>19 article right there?</p> <p>20 A. Just the highlighted portions?</p> <p>21 Q. No, no. Actually, go through the whole part.</p> <p>22 But just at the end of the highlighted portions, if you</p> <p>23 can stop, because I'm going to want to ask you a</p> <p>24 question.</p> <p>25 A. "Pozner is reportedly the parent of one of</p>	<p>117</p> <p>1 Hook parents, end quote."</p> <p>2 Q. Okay. And in that section right there where</p> <p>3 it's talking about Mr. Pozner's business; right? And</p> <p>4 -- and how he could be helping Sandy Hook hoax</p> <p>5 perpetrators; right? The company admits that that was</p> <p>6 reckless speculation it was publishing; correct?</p> <p>7 It was publishing this person's reckless</p> <p>8 speculation? Does the company agree with that or not?</p> <p>9 A. No, that looks like that person's opinion.</p> <p>10 Q. Correct. And the company was publishing;</p> <p>11 right? That? Chose to publish that?</p> <p>12 A. He's -- he's quoting someone else's opinion.</p> <p>13 Q. Correct. That person's opinion that he is</p> <p>14 quoting and that the company decided to publish and</p> <p>15 give to its viewers, the company now admits that that</p> <p>16 opinion was reckless speculation?</p> <p>17 A. No.</p> <p>18 Q. Does it admit that or not?</p> <p>19 A. No.</p> <p>20 Q. Okay. The company does not believe that was</p> <p>21 reckless speculation?</p> <p>22 A. No.</p> <p>23 Q. Okay. Can you read the last part of it for</p> <p>24 me, this last paragraph here.</p> <p>25 A. Sure. "After InfoWars swapped out the video</p>

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<p style="text-align: right;">118</p> <p>1 for an alternate copy, the video was again pulled.  2 This time, quote, due to a copyright claim by HONR  3 Network." There's a misspelling in there.  4 "End quote. A group which seeks, quote, to  5 bring awareness to hoaxer activity and to criminally  6 and/or civilly prosecute those who wittingly and  7 publicly defame, harass, and emotionally abuse the  8 victim of high profile tragedies and/or their family  9 members, end quote. HONR Network is apparently also  10 linked to Pozner."  11 Q. Okay. And then you see where it says, also  12 linked to Pozner, there's an Internet link there;  13 right?  14 A. Apparently also is -- looks like a link. The  15 words apparently and also.  16 Q. I think, actually, if you just do this.  17 A. Oh, okay. The whole thing looks like a link.  18 Q. Yeah. Okay. So there's a link there  19 directing their audience that says HONR is apparently  20 linked to Pozner; correct?  21 A. I don't know where that link leads, though.  22 Q. I don't either. I was -- I was going to  23 know, like, I was -- that's what I wanted to ask you.  24 What -- what -- what information did the company have  25 about Mr. Pozner being linked to HONR?</p>	<p style="text-align: right;">120</p> <p>1 company that could be commented on publicly.  2 Q. What politics is -- what -- what do you mean,  3 politically? What's the ideology of Mr. Pozner?  4 A. Of Mr. -- of HONR?  5 Q. Sure.  6 A. The company's position is that he's engaged  7 in anti First Amendment activity.  8 Q. Thank you. Now, were there any  9 communications between Mr. Pozner and the company?  10 A. I am aware that Mr. Pozner had reached out to  11 -- to the company and was responded to by someone who  12 works with Mr. Jones.  13 Q. Wait. Okay. So when did that happen?  14 A. Unfortunately, I don't recall the year. But  15 I do recall that Mr. Pozner wrote an e-mail basically  16 expressing that he was at one time a fan of the show.  17 That he was upset as to the coverage of InfoWars about  18 the tragedy, and that he wanted to speak to Mr. Jones  19 directly.  20 And I think one of his assistants responded  21 directly to him saying, you know, Mr. Jones is really  22 sorry for your loss. Will you be able to meet -- talk  23 to him at a specific time. Mr. Pozner responded  24 saying, I don't want to go on the air. And the  25 response to that was, no, Mr. Jones is available at</p>
<p style="text-align: right;">119</p> <p>1 A. I don't know where that links to, so I don't  2 know how the answer --  3 Q. Okay. So when you saw this article and saw  4 that the company was disclosing information, not merely  5 about Mr. Pozner's personal business, but about the  6 nonprofit charity front that he started to keep his  7 name out of things.  8 When you saw that they were disclosing that,  9 did you follow up on this in any way to figure out  10 where this came from?  11 A. I don't know that that link links to personal  12 information about Mr. Pozner, so I can't answer that.  13 Q. I don't either. I -- I wish you could.  14 A. I wish I could too. But unfortunately, I  15 can't.  16 Q. All right. We'll move on to something else.  17 A. Thank you.  18 Q. You're not going to know that. How does the  19 company today feel about the fact that it was  20 disclosing this kind of information about a Sandy Hook  21 parent to the public, to millions of people? How does  22 it feel about that?  23 A. I think that Mr. Pozner is an activist in  24 many ways. I think that his -- his company is engaged  25 in political speech and I think his company is a public</p>	<p style="text-align: right;">121</p> <p>1 this time and I don't know that that conversation ever  2 happened.  3 But there was a discussion about trying to  4 get the two of them to connect on the phone.  5 Q. Wow. Okay. I -- I haven't seen that. I --  6 I've seen -- so I know about a 2013 e-mail, right, that  7 I thought you were talking about, which is Mr. Pozner  8 writing in and complaining. And then Mr. Watson  9 replying to him saying, sir, we haven't done the whole  10 actors thing.  11 A. I'm aware of that too.  12 Q. We think the tragedy's very real. And so  13 then you think there's another --  14 A. There is another one.  15 Q. -- there's -- there's -- there's -- trying to  16 set up a phone conference between Mr. Pozner and  17 Mr. Jones?  18 A. Yes.  19 Q. Okay.  20 A. It was in the production that I read.  21 Q. Okay. And then do you think that that --  22 those series of communications there off that complaint  23 where Mr. Pozner said he was a fan and isn't anymore,  24 do you think that's the only communications the  25 company's had with him?</p>

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<p style="text-align: right;">122</p> <p>1 A. I'm sure there are others. That's the one 2 that I recall specifically. 3 Q. All right. Well, I'm trying to find out if 4 there are others. 5 A. Okay. That's the only e-mail I recall. I 6 don't think that they ever touched base on the phone. 7 But there was a discussion back and forth about trying 8 to schedule one. 9 Q. All right. Years later, are there any other 10 communications with Mr. Pozner? 11 A. I don't think so. 12 Q. Okay. What did you do to find that out? 13 A. I reviewed the material that we already 14 discussed. I spoke to Mr. Jones about it. Mr. Jones 15 wasn't aware of any other direct communication that he 16 had with Mr. Pozner. I talked to the other people that 17 we already spoke about. 18 Q. So if the company in this case has produced 19 e-mails between Mr. Pozner and Rob Dew a couple years 20 later in 2015, that's not something you've seen? Or 21 let me put it this way. 22 A. I'm sorry, let me -- okay. 23 Q. Let me pull that back. 24 A. Sure. 25 Q. If the company has produced documents from</p>	<p style="text-align: right;">124</p> <p>1 A. Which video are you talking about? 2 Q. Yeah. Do you -- so if I ask you about the 3 whole thing about Noah dying in Pakistan -- 4 A. Yes. 5 Q. -- do you know what I'm talking about? 6 A. Yes. 7 Q. Okay. So that was called Sandy Hook Victim 8 Dies Again In Pakistan; right? 9 A. I believe again is in parentheses. 10 Q. Sure. 11 A. Yes. 12 Q. Okay. Well, let me do it this way just so we 13 can kind of, like, just, like, Sandy Hook Victim Dies, 14 and then there's a parenthesis, Again in Pakistan. 15 A. Yes. 16 Q. All right? Okay. The company can understand 17 why that headlining is very upsetting; right? 18 A. To Mr. Pozner? 19 Q. Sure. 20 A. I can understand why that's upsetting to 21 Mr. Pozner. 22 Q. You can understand why it's upsetting to me; 23 right? 24 A. I can understand why it's upsetting. 25 Q. You can understand why it's upsetting to</p>
<p style="text-align: right;">123</p> <p>1 2015 years later of Mr. Dew and Mr. Pozner 2 corresponding, you wouldn't be prepared to talk to me 3 about those today? 4 A. I'm just trying to recall if I had seen 5 e-mails like that. I don't recall. If you have copies 6 of them, I'm happy to look at them. 7 Q. Okay. 8 A. I don't recall as I sit here right now. 9 Q. Okay. Mr. Pozner started all of this by 10 privately complaining to InfoWars; right? 11 A. He did. 12 Q. He was polite about it, wasn't he? 13 A. I believe so. 14 Q. Okay. And then he complained again, this 15 time, to YouTube in 2014 regarding this documentary 16 we're talking about right here, right, the Sandy Hook 17 viral documentary that's talked about in that article; 18 right? 19 A. I know he complained to YouTube. He made a 20 copyright claim. 21 Q. Okay. And then that video came down; right? 22 A. I believe so, yes. 23 Q. Okay. And you understand that the following 24 month, InfoWars wrote an article and made a video about 25 Noah Pozner. Do you know about that?</p>	<p style="text-align: right;">125</p> <p>1 pretty much any decent person; right? 2 A. I understand why it is upsetting. 3 Q. Okay. And the company understood that? 4 A. I understand that. The company understands 5 that now as we're sitting here, yes. 6 Q. Okay. Let's -- let's do that. That's -- 7 that's great. I appreciate that the company 8 understands that sitting here now. On January 2nd, 9 2015 when it published it, the company knew that that 10 would be upsetting? 11 A. So to understand just how that -- how that 12 article came to be sourced and came to be, we could 13 talk a little bit -- I don't know if this is the time 14 you want to do that. Talk a little bit about how that 15 the articles in general come to be. 16 But that article, I believe, was written by 17 Mr. Salazar. And as I said, there are certain people 18 in the company that are more interested in this topic, 19 or at that time, more interested in this topic more 20 than others. Mr. Salazar, I think, has made it clear 21 that he was one of the people that were more interested 22 than others. 23 The company's position was, you know, within 24 some loose parameters, write what you want to write. 25 You know, so they would go and source things from the</p>

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<p>126</p> <p>1 current day's news. This particular occasion, 2 Mr. Salazar viewed some footage of a -- I want to say 3 it was a protest in Pakistan following a school 4 shooting there. 5 And it was a BBC news correspondent article 6 with video that he linked to his article. And that has 7 since been edited to take out the -- the section that 8 he was relying on regarding that particular claim. But 9 more specifically, it was the reporter from BBC walking 10 past a wall of pictures. I think you know what I'm 11 talking about, the wall of pictures. 12 And I don't -- I don't know if we want to 13 call him by his first name, but essentially, Noah's 14 photo was on that wall. And that correspondent 15 represented that these were the victims of that 16 particular tragedy. He also sourced that material from 17 some Facebook posts that were on the school's web -- 18 Facebook page. And from there, wrote that article. 19 So as far as the question goes, the title, 20 the reason why again is in parentheses is because of 21 the confusion or perhaps mistake that these other news 22 articles were -- these other news sources were making 23 as the representation of that particular photograph 24 being in Pakistan at that time. 25 I think that's why when I said it's in</p>	<p>128</p> <p>1 Mr. Salazar; right? 2 A. Yes. 3 Q. Okay. Mr. Jones doesn't necessarily endorse 4 that, is what you're saying? 5 A. That's correct. 6 Q. Okay. Great. And you remember about a month 7 after that happened, that January video about Sandy 8 Hook Victim Dies Again in Pakistan, then a month later, 9 Mr. Jones made a video heavily about Mr. Pozner after 10 Mr. Pozner got that video removed. Do you remember 11 that? 12 A. If you could let me know which video we're 13 talking about. 14 Q. Yeah. That's February 12th, 2015. It 15 doesn't have a title. I was actually hoping maybe you 16 could tell me the title. 17 A. Does it have a -- well, the company uses a 18 bunch of -- a combination of letters and numbers. If 19 you could tell me the -- 20 Q. No, I don't know the -- the production -- 21 A. Okay. What's the date? 22 Q. February 12th, 2015. To help you, it's the 23 video we've been talking about with the P.O. Box 24 address. 25 A. Oh, you know what, that's -- I think I said</p>
<p>127</p> <p>1 parentheses, I think that's why it's in parentheses. 2 Q. Okay. 3 MR. BANKSTON: Objection. 4 Nonresponsive. 5 Q. (BY MR. BANKSTON) Do you know what question 6 you were just answering? 7 A. You asked me about the title and whether or 8 not the company knew at the time the title would be 9 upsetting. 10 Q. Bingo. Okay. So can we get back to that. 11 A. No, the company didn't know it would be 12 upsetting and I just explained the reason why. Because 13 the reason it was in parentheses was to make sure that 14 it was understood, the purpose and the content and the 15 position the article was making at the time. 16 Q. Okay. Mr. Pozner had previously made the 17 company aware that these sorts of coverage was 18 upsetting to him; right? 19 A. Yes. 20 Q. Okay. A month later -- so hold on. And I 21 want to make sure I understand this. Kind of the 22 position is here on this, Mr. Salazar was really 23 interested in Sandy Hook, basically able to publish 24 whatever you want. So when we see Sandy Hook Victim 25 Dies Again in Pakistan, that's not Mr. Jones, that's</p>	<p>129</p> <p>1 early on in that -- in our conversation that I wasn't 2 able -- I didn't see that video on the Dropbox. I saw 3 the article, but I didn't see the video on the Dropbox. 4 I think we talked about that early on. 5 Q. Wait, what -- what article? 6 A. The article that talks about the U-Haul and 7 the map. I'm pretty sure there was an article about 8 it. 9 Q. You have an article about that? 10 A. I thought there was an article. I thought 11 I saw an article about it. I thought we talked about 12 it. 13 Q. Okay. 14 A. But I don't think I saw that video. 15 Q. That goes along with the February 12th, 2015 16 show? 17 A. February 4th, you said? 18 Q. 12th. 19 A. 12th? Yeah, I don't have that as been 20 reviewed by me. 21 Q. Okay. 22 A. The video. 23 Q. All right. Did you review -- 24 A. That's -- 25 Q. Okay. So when you found out that you didn't</p>

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<p style="text-align: right;">130</p> <p>1 have any documents about that video, I mean, I'm sorry.  2 When you found out that you didn't have that video to  3 review --  4 A. Yeah.  5 Q. -- did you go look for any documents about  6 that video?  7 A. I did. So that's why I said I'm pretty sure  8 I saw an article on it.  9 Q. Okay. No, I meant about the video, not maybe  10 an article.  11 A. Oh, no. I -- so I did try to reach out to --  12 we have somebody that is trying to help us find  13 documents. So there's -- as you're aware, there's  14 various litigation in multiple states. And various  15 things have been produced and I'm not really sure where  16 they were produced.  17 So I did try to -- we have -- we have or had  18 at one time a liaison trying to help me out with that.  19 I did ask him to try to find it for me and he wasn't  20 able to locate it.  21 Q. Okay.  22 MR. BANKSTON: I need to note for the  23 record that we have actually just been joined by my  24 co-counsel, William Ogden, also representing the  25 plaintiffs.</p>	<p style="text-align: right;">132</p> <p>1 A. No. But the entire universe of Sandy Hook  2 videos --  3 Q. Sure.  4 A. -- is probably about 40, 43 videos, or 45  5 videos, something like that.  6 Q. We're going to need to talk about what that  7 number is. We'll talk about that later.  8 A. Sure.  9 Q. But when you discovered that you did not have  10 access to the February 12th, 2015 video, you did not go  11 get the daily show log for the February 12th, 2015  12 video; correct?  13 A. No, I didn't -- I don't think I reviewed it.  14 Q. Okay. So you see how it has up here in giant  15 red letters, do not upload any video of show to  16 YouTube?  17 A. Yes.  18 Q. You can't tell me anything about that; right?  19 A. I don't know why that's there.  20 Q. Yeah. I wanted to ask you about that, and  21 that's not something you can tell me?  22 A. I don't know, unfortunately. I'm sorry.  23 Q. And so you wouldn't know who put that there?  24 A. I -- I don't know. I think that generally  25 speaking, just based on my conversations with -- with</p>
<p style="text-align: right;">131</p> <p>1 Q. (BY MR. BANKSTON) Ms. Paz, I have handed you  2 what I have marked as Exhibit 5. I take it you've  3 never seen this document before; right?  4 (Exhibit No. 5 marked.)  5 A. May I just have a minute?  6 Q. (BY MR. BANKSTON) Uh-huh.  7 A. Oh, it's double-sided. Okay. No.  8 Specifically, this document -- no. But I am aware that  9 the company does produce daily logs of the show.  10 Q. Okay. And -- and you didn't look at them?  11 A. Not all of them. There's a -- there -- we do  12 three three-hour -- two -- three three-hour segments.  13 So -- and they're all broken down into these -- these  14 -- these individual segments, which are then produced  15 into video clips. So that would have been hundreds of  16 videos or hundreds of logs, so to speak. But --  17 Q. No, there's -- there's 20 -- there's 20 --  18 you would agree with me there is about 20 individual  19 videos identified in plaintiffs' petition of 20  20 different dates?  21 A. Dates, right. So there's about 40, 43, or 45  22 videos that I watched. Each of --  23 Q. All right. That's not all of --  24 A. Right.  25 Q. -- the plaintiffs' petition, though; right?</p>	<p style="text-align: right;">133</p> <p>1 Daria --  2 Q. Well, hold on. Can I -- can I stop you  3 before you answer that question?  4 A. I just know who produces these documents in  5 general.  6 Q. Right. But I want to caution you not to make  7 guesses or inferences based on--  8 A. No, I don't know --  9 Q. I want you to talk what you know.  10 A. Right. I don't know who produced this  11 specific video, but based on my conversations with  12 Daria, the assistant producers started producing these  13 -- these types of logs to make it easier to try to find  14 video clips later on. Because she -- she said it's  15 like finding a needle in a haystack.  16 It was ultimately, you know, they were saved  17 on a drive, but there was no real way to search for  18 those clips. And so, you know, if one of the hosts  19 said, hey, I want to find this clip. Nobody would  20 really know on what day. So they started producing  21 these logs to make that easier to see what -- what  22 people were talking about on a specific day.  23 But as far as which -- which producer  24 produced this, which assistant associate producer  25 produced this, I -- I don't know.</p>



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<p>134</p> <p>1 Q. So you don't have any idea of -- of what</p> <p>2 employees played what role in this show?</p> <p>3 A. I know a -- a producer would have produced</p> <p>4 this, an associate producer would have produced this.</p> <p>5 Q. I'm sure.</p> <p>6 A. But I don't know --</p> <p>7 Q. I'm sure a producer would have been involved.</p> <p>8 A. Right. Right.</p> <p>9 Q. Okay. But my question is, you don't know</p> <p>10 what employees played any particular roles in the</p> <p>11 creation of this video?</p> <p>12 A. As far as this video? So the video is just</p> <p>13 looking -- looking at the document, I could tell you</p> <p>14 who played a role in producing -- in the production of</p> <p>15 the video. So Alex Jones hosted it and Rob Dew and</p> <p>16 David Knight were also cohosting it.</p> <p>17 Q. Right, I can read the document too.</p> <p>18 A. Right. And then it's also citing to Adan</p> <p>19 Salazar's article.</p> <p>20 Q. Sure.</p> <p>21 A. So --</p> <p>22 Q. But, I mean, in terms of who produced this,</p> <p>23 we don't know?</p> <p>24 A. Produced the document or the show?</p> <p>25 Q. The show.</p>	<p>136</p> <p>1 told me, exact same thing.</p> <p>2 A. Okay.</p> <p>3 Q. And then she didn't have a list to give me.</p> <p>4 A. Okay.</p> <p>5 Q. Are you telling me right now --</p> <p>6 A. I think -- I think Attorney Blott's going in</p> <p>7 her bag. You want to mark it?</p> <p>8 Q. I do. Okay. I'm going to mark both -- we'll</p> <p>9 put them together. Okay. I'm going to call this 6.</p> <p>10 I'm going to hand this to you to just -- first of all,</p> <p>11 if you can verify to me, this is the list that you --</p> <p>12 first of all, what is this?</p> <p>13 (Exhibit No. 6 marked.)</p> <p>14 A. So in request -- in response to your request</p> <p>15 as to who had been working on the days that -- that</p> <p>16 various videos in the petition had been produced.</p> <p>17 Q. (BY MR. BANKSTON) Uh-huh.</p> <p>18 A. The company went back into its records and</p> <p>19 searched -- essentially searched, you know, its -- its</p> <p>20 internal records to determine who was working on those</p> <p>21 particular days.</p> <p>22 Q. Okay. Who prepared this list?</p> <p>23 A. You know what, I'm not a hundred percent sure</p> <p>24 who prepared it.</p> <p>25 Q. Who did you get it --</p>
<p>135</p> <p>1 A. I -- well, you mean the employees that were</p> <p>2 working on that particular day?</p> <p>3 Q. Yeah. I want to know who the producer is.</p> <p>4 You don't know, do you?</p> <p>5 A. I could tell you who was working on this</p> <p>6 particular day as a producer.</p> <p>7 Q. Is that, like, you have a document of that?</p> <p>8 A. I have -- I think you requested for us to try</p> <p>9 to find out who was working on each particular day.</p> <p>10 Q. I know what I requested. I'm asking --</p> <p>11 A. Right.</p> <p>12 Q. -- do you have a document of it?</p> <p>13 A. I think that we've -- we've made that</p> <p>14 determination.</p> <p>15 Q. I don't know -- I don't -- I'm not asking if</p> <p>16 you made a determination. I'm asking, do you have a</p> <p>17 document of that?</p> <p>18 A. I can -- if I could consult with counsel,</p> <p>19 because I think that --</p> <p>20 Q. Hold on. I don't want you to consult with</p> <p>21 counsel about whether you should answer that question.</p> <p>22 A. I just don't have the list on me right now,</p> <p>23 but I believe that we have a list of who was working on</p> <p>24 the show on that particular day.</p> <p>25 Q. All right. That's the same thing Ms. Karpova</p>	<p>137</p> <p>1 A. I --</p> <p>2 Q. Did you get it from counsel, or --</p> <p>3 A. I got it from counsel. So I don't know who</p> <p>4 prepared it.</p> <p>5 Q. Okay. Can you hand me it back real quick,</p> <p>6 because I --</p> <p>7 A. Sure.</p> <p>8 Q. -- I don't have a copy of it, so I need to</p> <p>9 kind of look at it. And I'll hand it back to you for</p> <p>10 this question. Okay. What I'm seeing here is lists of</p> <p>11 names for ten different videos.</p> <p>12 A. That's what it looks like, yes.</p> <p>13 Q. Okay. All right. So those are the -- are</p> <p>14 those the days you can tell me when people were</p> <p>15 working?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. So if there are videos that didn't</p> <p>18 happen on that day, you can't tell me who was working</p> <p>19 those days?</p> <p>20 A. No. I know there are other videos aside from</p> <p>21 these --</p> <p>22 Q. Sure.</p> <p>23 A. -- these particular videos. Because like we</p> <p>24 said, there's -- there are -- there are 40-something</p> <p>25 videos, maybe 45 videos.</p>

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<p>138</p> <p>1 Q. Well, there's -- there's certainly some in 2 plaintiffs' petition; right?</p> <p>3 A. Yes.</p> <p>4 Q. And then part of that was you were to get up 5 to speed on the employees who were involved in those 6 videos; right?</p> <p>7 A. I know that we are talking currently about 8 this February 2015 video.</p> <p>9 Q. I'm just asking you, you were --</p> <p>10 A. That's on here.</p> <p>11 Q. Yeah. You were asked to get up to speed on 12 who was involved in the videos in plaintiffs' petition; 13 right?</p> <p>14 A. Right. I don't know these dates offhand. I 15 don't know if these are the dates of those particular 16 videos.</p> <p>17 Q. Well, one thing we know for certain is it's 18 not all of the videos in plaintiffs' petition, is it?</p> <p>19 A. I don't know. I didn't produce this. So I 20 don't know -- I don't know the answer to that.</p> <p>21 Q. All right. Can I see that again?</p> <p>22 A. Sure.</p> <p>23 Q. Okay. So when you got these documents here 24 of who was working, somebody gave these to you?</p> <p>25 A. Yeah.</p>	<p>140</p> <p>1 I've spent a lot of time in the last week with this 2 company and it's not that way.</p> <p>3 Q. No, it's not.</p> <p>4 A. So there are not a lot of records. There 5 aren't a lot of communication between departments. So, 6 you know, generally speaking, in the event that there 7 were people working, like, in production in one 8 department, sometimes, we just wouldn't know in another 9 department.</p> <p>10 Like, so, in all likelihood, what happened 11 with these records was that our HR person went through 12 and tried to figure out who was there that day. But 13 that doesn't mean she went to the production department 14 and personally questioned everybody, and I certainly 15 didn't do that. Were you here on this day, this day, 16 this day, this day. You know what I'm saying?</p> <p>17 Q. I do.</p> <p>18 A. So when I -- and I believe if -- I believe 19 Melinda did that, you know, to the best of her 20 information, tried to get these lists. But like I 21 said, because they don't talk to each other, the 22 different departments, and there's no real records as 23 to who's checking in and checking out on a various day, 24 it's -- it's hard to give a definitive answer as to --</p> <p>25 Q. I get it.</p>
<p>139</p> <p>1 Q. Did you inquire if these are all the videos 2 in the plaintiffs' petition?</p> <p>3 A. No. I don't know who produced that.</p> <p>4 Q. Okay. What do the highlights mean?</p> <p>5 A. I don't know. I did not highlight them.</p> <p>6 Q. Okay. So you didn't ask what these 7 highlights mean; right?</p> <p>8 A. No.</p> <p>9 Q. Okay. Well, I noticed there's one day -- so 10 I got, like, one day here. We got September 25th, 2014 11 and I'm seeing about a dozen people on here. And then 12 I see, like, 12/27/2014, there's only one name. Do you 13 know what that is about?</p> <p>14 A. May I see it?</p> <p>15 Q. Yeah, sure. Was he the only guy working that 16 day, or what's going on there? I don't understand why 17 there's just one name.</p> <p>18 A. That means to me that based on our records, 19 that's all we know about who was working that day. So, 20 you know, part of the problem that I was indicating 21 earlier, and I -- and I know that it's -- it may not 22 make a whole lot of sense because you look at a media 23 corporation, like, you know, CNN.</p> <p>24 And they have very, very intricate records 25 and they have very intricate procedures and policies.</p>	<p>141</p> <p>1 A. -- who was there that day.</p> <p>2 Q. What I'm trying to get at, though, is -- is I 3 understand you're telling me a lot of stuff about why 4 things were hard, all this sort of stuff. What I'm 5 trying to get at is some of these -- some of these 6 entries have, like, a ton of people's names. Like, a 7 dozen names.</p> <p>8 A. Right.</p> <p>9 Q. And some of them only have, like, one or two. 10 And -- and from what I understand you're saying is, is 11 you were making certain inferences about why that's 12 true.</p> <p>13 A. I think the reason --</p> <p>14 Q. You don't know why that's true, you're just 15 making inferences; right?</p> <p>16 A. Well, yes. I think the reason why that is, 17 is because that was the only information Melinda was 18 able to source for those particular days.</p> <p>19 Q. Did you talk to her about this list?</p> <p>20 A. I didn't talk to her about this list 21 specifically.</p> <p>22 Q. Okay.</p> <p>23 A. But I've -- I've spoken to her about, you 24 know, why there aren't many documents.</p> <p>25 Q. Okay. Can you -- can I see that real quick?</p>

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<p style="text-align: right;">142</p> <p>1 A. Sure.</p> <p>2 Q. Okay. So what did -- do you know what Nico</p> <p>3 Acosta did for this video, for this 2015 video?</p> <p>4 A. Nico Acosta did the programming for Alex</p> <p>5 Jones, The Alex Jones Show.</p> <p>6 Q. Okay.</p> <p>7 A. So his job was to coordinate guests such that</p> <p>8 there were guests available. And to, you know, do the</p> <p>9 basic scheduling for that day. So that's what his role</p> <p>10 would have been.</p> <p>11 Q. I noticed that David Knight and Travis Knight</p> <p>12 are both on this list -- on this video.</p> <p>13 A. David Knight. Yes, I think David Knight</p> <p>14 per -- per Exhibit 5 was one of the hosts.</p> <p>15 Q. That's one of the people you didn't talk to;</p> <p>16 right?</p> <p>17 A. I did not talk to David, no. He's not a</p> <p>18 current employee.</p> <p>19 Q. Okay. And Josh -- I understand he's not a</p> <p>20 current employee. I get that. Josh Owens, he's on</p> <p>21 this list; right?</p> <p>22 A. Yes.</p> <p>23 Q. I'm just going to show you Josh Owens is on</p> <p>24 this list.</p> <p>25 A. Yes.</p>	<p style="text-align: right;">144</p> <p>1 the first page really quick on -- I talked about this</p> <p>2 red part here.</p> <p>3 A. Yes.</p> <p>4 Q. But now, I want to go to page 2. And so</p> <p>5 that's actually going to be on the reverse side.</p> <p>6 A. Sure.</p> <p>7 Q. Okay. And we'll see here it talks about hour</p> <p>8 number one; right?</p> <p>9 A. Yes.</p> <p>10 Q. And then you see segment number one; right?</p> <p>11 A. Yes.</p> <p>12 Q. And then it says right there, mystery, Sandy</p> <p>13 Hook victim dies, parentheses, again, closed</p> <p>14 parentheses, in Pakistan?</p> <p>15 A. Yes.</p> <p>16 Q. Right? Okay. So this was a show Mr. Jones</p> <p>17 was doing; right?</p> <p>18 A. He was the host of the show, yes.</p> <p>19 Q. Yeah. So Mr. Jones kept saying that Noah</p> <p>20 died again in Pakistan even though the company knew</p> <p>21 Mr. Pozner was distressed by it; right?</p> <p>22 A. I don't know that he said Noah died in</p> <p>23 Pakistan. I think what he was saying was, here is an</p> <p>24 article that we wrote and here's a cut to the BBC</p> <p>25 footage and Noah -- Noah's photo is in that footage.</p>
<p style="text-align: right;">143</p> <p>1 Q. Did you speak to Mr. Owens?</p> <p>2 A. No.</p> <p>3 Q. Mikael Thalen's on this list; right?</p> <p>4 A. Sure. I don't have a copy of it in front of</p> <p>5 me. I'm just --</p> <p>6 Q. Yeah, okay. Yeah. What did Mr. Thalen do</p> <p>7 with this video?</p> <p>8 A. I don't know.</p> <p>9 Q. Okay. We're not --</p> <p>10 A. Just -- I just want to clarify. Just because</p> <p>11 they're on this list doesn't mean they had anything to</p> <p>12 do with this video.</p> <p>13 Q. In fact, somebody would have to go check with</p> <p>14 them to figure out if they did have something to do</p> <p>15 with that video; right?</p> <p>16 A. Right. This is only the list of who was</p> <p>17 working that particular day. That doesn't mean that</p> <p>18 they sourced this -- that they had anything to do with</p> <p>19 this particular video.</p> <p>20 Q. I understand that completely.</p> <p>21 A. Sure.</p> <p>22 Q. Let's -- can you go back to this document</p> <p>23 here that is --</p> <p>24 A. Sure. Exhibit 5.</p> <p>25 Q. -- Exhibit -- Exhibit 5. Okay. So we talked</p>	<p style="text-align: right;">145</p> <p>1 Q. Well, what I -- what I want to get to is we</p> <p>2 had talked earlier about how that article was just</p> <p>3 Mr. Salazar and that's not necessarily Mr. Jones</p> <p>4 endorsing this or anything. But here is Mr. Jones</p> <p>5 literally reading that same headline on his show;</p> <p>6 right?</p> <p>7 A. He's reading a headline that was -- that was</p> <p>8 reported by somebody else, yes.</p> <p>9 Q. Well, no. I mean, we understand Mr. Salazar</p> <p>10 doesn't do -- he doesn't report or publish anything.</p> <p>11 Free Speech Systems publishes things; right?</p> <p>12 A. Well, he is a writer for Free Speech. So</p> <p>13 yes, Free Speech publishes it.</p> <p>14 Q. I'm just -- I'm just trying to -- is there</p> <p>15 any reason why you're -- why the company's trying to</p> <p>16 disclaim responsibility for what Mr. Salazar wrote?</p> <p>17 A. No, he wrote it.</p> <p>18 Q. Right. And the company published it.</p> <p>19 A. And the company published it.</p> <p>20 Q. And then Mr. Jones came on again; right?</p> <p>21 Right?</p> <p>22 A. What do you mean, he came on the show?</p> <p>23 Q. Right. Mr. Jones came on the show and</p> <p>24 published that headline again; right?</p> <p>25 A. He published the headline, yes.</p>

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<p style="text-align: right;">146</p> <p>1 Q. Sure. So Mr. Jones did that even though he 2 knew it would cause Mr. Pozner distress; right? 3 A. I don't know that he knew that it would cause 4 Mr. Pozner distress. 5 Q. Well, first of all, we know that the company 6 sitting here now understands that that headline would 7 have caused Mr. Pozner distress? 8 A. Right. 9 Q. Right. But Mr. Jones didn't understand that? 10 A. I don't know if Mr. Jones personally had any 11 involvement in those e-mails that Mr. -- because 12 Mr. Jones doesn't have an e-mail address, I'm sure 13 you're aware of that. 14 Q. Yes, he does. 15 A. Well, he doesn't use e-mail. Let's put it 16 that way. 17 Q. Okay. I mean, again, I'm very concerned that 18 you would sit here in testimony under oath and tell me 19 Mr. Jones doesn't have an e-mail address, because he 20 absolutely does. 21 A. He does not use his e-mail. 22 Q. Okay. So let's -- let's try to say that 23 instead of the thing that wasn't true. 24 A. Sure. 25 Q. Okay.</p>	<p style="text-align: right;">148</p> <p>1 A. I don't know. I didn't watch that video. 2 Q. Okay. All right. You testified that 3 Mr. Jones didn't have any involvement or have any 4 knowledge of the communications of Mr. Pozner? 5 A. I said I didn't know. 6 Q. Did you ask him? 7 A. I'm trying to remember my conversation with 8 Mr. Jones. I don't think we talked about that. 9 Q. Okay. So in terms of what knowledge 10 Mr. Jones has about Mr. Pozner and what he's told the 11 company, you didn't talk to Mr. Jones about that? 12 A. No. But as you said, he's been deposed, so 13 -- 14 Q. Sure. And one of the interesting things 15 about that is do you think there's any testimony in 16 there about him in these communications? 17 A. About? 18 Q. Mr. Jones not only being aware, but being 19 involved in these communications. 20 A. Oh, I don't know. 21 Q. Okay. Yeah, can I understand which 22 depositions of Mr. Jones you read? 23 A. I know he's done a few, so I -- 24 Q. He's done three. 25 A. Right. So I read the most recent one, which</p>
<p style="text-align: right;">147</p> <p>1 A. So he doesn't use e-mail. The e-mails that 2 we were referring to earlier on about Mr. Pozner 3 communicating his displeasure with the coverage were 4 not responded to by Mr. Jones. They were responded to 5 by other people. I don't know what Mr. Jones knew or 6 didn't know about Mr. Pozner's communication of 7 displeasure at this point in time. 8 Q. Because you didn't read his deposition, 9 right, where he talked about it; right? 10 A. But assuming that, I will also say that this 11 is not altogether uncommon where you source another 12 article and publish the article. I don't know that 13 necessarily this is an adoption by Mr. Jones of what 14 the content of the article is. 15 Q. Now -- okay. Actually, I was about to say, 16 well, you know it is because you watched the video. 17 But you didn't watch the video, so -- 18 A. No, that was the one -- that was the video -- 19 Q. Yeah. 20 A. No, no. This video? Let me -- I'm sorry. 21 Yes, I didn't watch this video. 22 Q. Okay. Because Mr. Jones says in this video 23 that either the Pakistan thing is fake or the Sandy 24 Hook thing is fake. One of these has to be fake. Do 25 you know he said that?</p>	<p style="text-align: right;">149</p> <p>1 was in December. 2 Q. Uh-huh. 3 A. And I've read the March one, but I don't 4 think I read the March 2019 one. 5 Q. Okay. 6 A. But I don't think I read the third one. 7 Q. Okay. If you look at segment two -- 8 A. Sure. 9 Q. -- down at the bottom, it says it again, 10 right, Mystery Sandy Hook Victim Dies Again in 11 Pakistan? 12 A. Yes, I see that. 13 Q. Okay. And there's some Sandy Hook 14 commentary. Do you see where it says that? 15 A. Oh, right above that? 16 Q. Yeah. 17 A. Yes. 18 Q. You're not able to talk to me about what that 19 commentary was? 20 A. No. 21 Q. Okay. It says he showed a copyright claim 22 document on camera. Do you know what that refers to? 23 A. I think it probably refers to Mr. Pozner's 24 attempts to get videos removed. 25 Q. Are you -- do you know that, or is that just</p>

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<p>150</p> <p>1 kind of something you're thinking might be true right 2 now? 3 A. I think that that's what's true. 4 Q. But have you done anything to figure that 5 out? 6 A. No. 7 Q. So that document -- and actually, can you go 8 ahead and flip the page again for me now. 9 A. On the first page? 10 Q. Yeah. Now, we're going -- no. Now, we're 11 going to the one that says 924. So it's -- keep going. 12 It would be the next page. Do you see the Bates number 13 924? 14 A. Yes. 15 Q. Okay. And on this page on segment four, it 16 also talks about showed copyright claim document on 17 camera. 18 A. Yes. 19 Q. Okay. If this is the complaint or some sort 20 of complaint from Mr. Pozner -- 21 A. Uh-huh. 22 Q. -- you haven't done anything to locate it or 23 figure out what it is? 24 A. No, but what this means to me is that during 25 this segment, he showed the actual document.</p>	<p>152</p> <p>1 I believe it's this video -- about the -- the address. 2 And I think this was when we had the discussion about 3 his U-Haul address. 4 And -- and I think at the time, the problem 5 was that they didn't understand that the U-Haul has 6 P.O. boxes. And so they were wondering why the 7 address, the official address, would be at a U-Haul. 8 Q. Really? That's -- 9 A. And that's what they were talking about -- 10 Q. That's -- 11 A. -- with the physical discrepancy. 12 Q. That's the discrepancy? 13 A. I think that's the discrepancy. 14 Q. Okay. 15 A. When I talked to Rob Dew, that was his -- his 16 understanding. 17 Q. Well, you know he -- he identified a UPS 18 store. You remember him identifying a UPS store? 19 A. I thought it was a U-Haul store. 20 Q. He did that too. But do you remember the -- 21 do you know anything about the UPS store? 22 A. No, I don't. 23 Q. Obviously, it's not -- even somebody like Rob 24 Dew know's there's P.O. boxes at a UPS store; right? 25 A. I can't testify as to what Rob Dew knows.</p>
<p>151</p> <p>1 Q. On his document camera? 2 A. On his document camera. 3 Q. On his desk camera? 4 A. Right. 5 Q. Exactly. He did. Let's go to the next page. 6 See the page, and it's Bates number 925? 7 A. Uh-huh. 8 Q. Okay. Do you see segment four? 9 A. Yes. 10 Q. It says, HONR Network physical address 11 discrepancy slash donations. Do you see where it says 12 that? 13 A. Yes. 14 Q. What did the company mean by physical address 15 discrepancies and donations? 16 A. I think -- 17 Q. First of all, let me ask you. Let me -- 18 A. Sure. 19 Q. Have you undertaken any steps to understand 20 what the company -- before coming to this room, what 21 the company meant by HONR Network physical address 22 discrepancies and donations? 23 A. Yeah. So when I spoke to Rob Dew, I did 24 speak to Rob Dew about the claims that were made in 25 connection with Mr. Pozner and his -- and the video --</p>	<p>153</p> <p>1 Q. You certainly didn't ask him, did you? 2 A. I didn't ask him, no. 3 Q. Okay. How did they know that was where Lenny 4 was picking up his mail? How did they know that was 5 his address? 6 A. You mean where did they get that address 7 from? 8 Q. Sure. 9 A. Well, when I asked Rob -- I did ask Rob Dew 10 that question. And his information was that when he 11 did a search on the HONR Network, that address came up 12 as a mailing address. 13 Q. Okay. So he did some research into the 14 issue? 15 A. I think he looked for the HONR Network 16 because the HONR Network was being -- was engaged in 17 getting information taken off of the YouTube page. So 18 it led him to looking into that particular 19 organization. 20 Q. Those are those anti First Amendment 21 activities you referenced earlier; right? 22 A. That's correct. 23 Q. Okay. When it says there next, the 24 HONR Network group going after the Second Amendment, 25 what does the company mean by that?</p>

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<p>154</p> <p>1 A. I think that the opinion was that the HONR 2 Network, in addition to this First Amendment activity, 3 is involved in Second Amendment activity. 4 Q. What do you mean -- what -- okay. First of 5 all, did you talk to Rob Dew about that? Is that 6 something you talked to him about? 7 A. Rob Dew. I don't know if it was in my 8 conversation with Rob Dew or with -- with Mr. Jones. 9 But I think that the general understanding is that the 10 HONR Network is engaged in that type of political 11 speech for First Amendment speech and Second Amendment. 12 Q. Second Amendment. What do you -- Second 13 Amendment's about guns; right? 14 A. Yes. 15 Q. Okay. And -- and so you're testifying here 16 is that company's understanding is that the HONR 17 Network engages in Second Amendment activities related 18 -- what -- what activities is it engaged in relating to 19 the Second Amendment? 20 A. So this -- this goes back to -- this circles 21 back to the conversation we were having about Ms. Lewis 22 as well, about individual people's opinions about the 23 things that companies are engaged in or the activities 24 that they're engaged in. 25 Q. Sure.</p>	<p>156</p> <p>1 A. Possibly, I don't know. But it's an opinion 2 statement. 3 Q. Sure. And so what I asked you to be prepared 4 for was the company's knowledge of the plaintiffs. 5 A. Uh-huh. 6 Q. And I'm assuming that any opinions the 7 company has about the plaintiffs are informed by what 8 knowledge it has about the plaintiffs. Certainly, the 9 company is not going to make opinions based on no 10 knowledge. Do you understand what I'm saying? 11 A. Well, the company's opinions and the 12 individual hosts' opinions are two different things. 13 Q. Absolutely. And that's why I've also asked 14 you about sourcing and research for the plaintiffs' 15 petition. 16 A. Right. 17 Q. So that's why I want to know Rob Dew's 18 opinion and I want to know the company's opinion. 19 A. I -- and I've testified that I believe Rob 20 Dew's opinion is that they are engaged in this type of 21 activity. 22 Q. And I'm asking you, what knowledge does -- 23 does -- was ever researched or does the company possess 24 about Lenny Pozner that would support that opinion? 25 A. I don't know what Rob Dew based his opinion</p>
<p>155</p> <p>1 A. So it -- it's not -- for example, it's not 2 the company's position that Ms. Lewis is engaged in 3 anti -- anti gun control stuff. But individual people 4 in the company may interpret her -- her associations as 5 such; right? And I think that that is -- is what is 6 being discussed here. 7 You know, Rob Dew and David Knight are on the 8 show. And Rob Dew, you know, as I said, Mr. Dew was 9 one of those people that were more interested in Sandy 10 Hook than others at -- at the company. And I think 11 it's Mr. Dew's opinion that the HONR Network was 12 engaged in Second Amendment activity. 13 Q. What facts is that based off of? Do you have 14 -- do you have any idea? 15 A. I can't testify to Rob Dew's opinions. I 16 don't -- I don't know, in all honesty. 17 Q. Yeah. Because I'm -- I'm trying to figure 18 out how this got on air. How it got on air that 19 InfoWars told its audience that Lenny Pozner was coming 20 after the Second Amendment. I want to know how that -- 21 A. That's an opinion statement. It's an opinion 22 statement based on Rob Dew's opinion. 23 Q. Right. And so -- 24 A. And possibly David Knight's opinion. 25 Q. Possibly, but we have -- we don't know.</p>	<p>157</p> <p>1 on. Like I said, I didn't watch this particular video. 2 Q. And in terms of the -- excuse me. The 3 sourcing or research that went into making this 4 statement, you don't know that either? 5 A. No, because I didn't watch the video. 6 Q. Okay. Or -- and -- and let's make it clear. 7 You didn't just not watch the video, you didn't review 8 any documents about the video; right? 9 A. Aside from this -- what you've produced to me 10 right here and -- oh, well -- actually, no. That's not 11 -- that's not a hundred percent accurate because I did 12 review this Sandy Hook Victim Dies Again in Pakistan 13 article. But aside from those things, I'm not aware of 14 any other documents that exist. 15 Q. Okay. Can you summarize any other 16 information the company has about Mr. Pozner? 17 A. Has as we sit here today? 18 Q. Uh-huh. 19 A. I have seen a background check that was 20 produced in the production. 21 Q. Okay. Tell me about that. Where did that 22 come from? 23 A. You know, interestingly enough, I cannot 24 determine where that came from. 25 Q. That's less interesting than you might think.</p>

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<p>158</p> <p>1 A. Okay.</p> <p>2 Q. No, so when you say you can't determine where</p> <p>3 it came from, let's -- let's -- let me back up, because</p> <p>4 I may have started at a bad place.</p> <p>5 A. Sure.</p> <p>6 Q. When you understood that that background</p> <p>7 report exists, what did you do to find out where it</p> <p>8 came from?</p> <p>9 A. So I have spoken to Mr. Jones. I've spoken</p> <p>10 to Mr. Dew. I've tried to go through the production</p> <p>11 material in the e-mails to find out if it was -- if it</p> <p>12 was produced in an e-mail. I don't see it connected to</p> <p>13 an e-mail. Mr. Jones is not aware of where it came</p> <p>14 from. Mr. Dew is not aware of where it came from.</p> <p>15 I can speculate, but I don't want to do that</p> <p>16 because I don't honestly know where it came from.</p> <p>17 Q. Okay.</p> <p>18 A. I do know it is amongst the materials in the</p> <p>19 production, but I can't testify as to when it -- when</p> <p>20 or how it came to be there.</p> <p>21 Q. Well, somebody put it in there; right?</p> <p>22 A. I don't know how it came to be there.</p> <p>23 Q. Well, I -- I know that. I know you don't</p> <p>24 know that.</p> <p>25 A. Yeah.</p>	<p>160</p> <p>1 who are the last person in the chain of custody who</p> <p>2 gave it to me, have you talked to attorneys about where</p> <p>3 this came from?</p> <p>4 MS. BLOTT: You can indicate whether</p> <p>5 you have spoken to attorneys, but not conversations</p> <p>6 you've had with them.</p> <p>7 A. I have spoken to attorneys about where it</p> <p>8 could have come from, yes.</p> <p>9 Q. (BY MR. BANKSTON) Okay. As not any</p> <p>10 descriptions of those -- of those discussions, but it's</p> <p>11 fair to say that after the conclusions of those</p> <p>12 discussions, you are not able to give me any</p> <p>13 information about where it came from?</p> <p>14 A. That's accurate.</p> <p>15 Q. Okay.</p> <p>16 A. Oh, and if I may, I -- I guess I should say</p> <p>17 there are -- there are two background checks that I saw</p> <p>18 in those productions relating to Mr. Pozner.</p> <p>19 Q. Okay.</p> <p>20 A. One is longer and one is shorter. I'm pretty</p> <p>21 sure -- and I think I know where the first -- the --</p> <p>22 the shorter one came from. I believe that was produced</p> <p>23 in connection with a lawsuit that Mr. Halbig and</p> <p>24 Mr. Pozner have.</p> <p>25 Q. Okay.</p>
<p>159</p> <p>1 Q. But somebody put it in there; right?</p> <p>2 A. It had to have gotten there somehow.</p> <p>3 Q. Yeah, exactly. So -- so somebody had to have</p> <p>4 this year, because this is when it was produced. Wait.</p> <p>5 A. Oh, I don't know -- I can't --</p> <p>6 Q. You don't know when it was produced?</p> <p>7 A. I don't know when it was produced and I don't</p> <p>8 know when it came to the company. So I don't know if</p> <p>9 it was produced -- if it came into our attention this</p> <p>10 year. I don't know.</p> <p>11 Q. Okay.</p> <p>12 THE WITNESS: Attorney Blott, can you</p> <p>13 give me another water, please. Thank you.</p> <p>14 Q. (BY MR. BANKSTON) So I know you can't talk</p> <p>15 to me about what you talked to them about.</p> <p>16 A. What I talked to them about?</p> <p>17 Q. Hold on. Hold on. Let me get the whole</p> <p>18 question out.</p> <p>19 A. Sure.</p> <p>20 Q. In fact, preface, we -- we just talked about</p> <p>21 you talking to a couple people, Mr. Dew, Mr. Jones,</p> <p>22 about this background report. And I know you can't</p> <p>23 talk to me about the substance of conversations you've</p> <p>24 had with attorneys.</p> <p>25 But considering that attorneys were the ones</p>	<p>161</p> <p>1 A. And somehow, that came to be in our</p> <p>2 documents, whether Mr. Halbig e-mailed that to us or</p> <p>3 whatever. But I believe the allegation is that, at</p> <p>4 least Mr. Pozner's allegation in connection with that</p> <p>5 lawsuit, that Mr. Halbig produced that background</p> <p>6 check.</p> <p>7 Q. Got you.</p> <p>8 A. I believe it's 99 pages or a hundred pages</p> <p>9 long. It's, like, a shorter background check.</p> <p>10 Q. Sure.</p> <p>11 A. So I -- I did see the both of them.</p> <p>12 Q. Okay.</p> <p>13 A. But the longer one, I am not sure. I can't</p> <p>14 testify as to where that came from.</p> <p>15 Q. Okay. I know you don't know where you came</p> <p>16 from, but do you know who found it in the files?</p> <p>17 A. I don't know.</p> <p>18 Q. Do you know where it resided in InfoWars'</p> <p>19 files?</p> <p>20 A. No. And that's -- that's the interesting</p> <p>21 part, is I tried to determine if it came to us in an</p> <p>22 e-mail or if it came to us in some other fashion. And</p> <p>23 I can't find the origin.</p> <p>24 Q. Okay. So we had the first -- we had the</p> <p>25 first background report that I was talking about with</p>

<p>162</p> <p>1 Ms. Karpova, the big one; right? But I -- I want to 2 talk to you about the second one you've talked about, 3 the shorter one. 4 A. Sure. 5 Q. That one for Mr. Halbig, who saved that? Why 6 -- why -- how did that get saved? 7 A. What do you mean, how did it get saved? 8 Q. Like, where -- first of all, where did it 9 come from in InfoWars' files? Do you know that? 10 A. I believe it might have been in an e-mail. 11 But in all honestly, I'm not a hundred percent sure. 12 Q. Okay. 13 A. We did not produce it. Like, so we didn't 14 ask for it to be produced. I think it was sent to us. 15 I'm just not sure how. 16 Q. How do you know it was sent to you? 17 A. Because I think that it originated with 18 Mr. Halbig. 19 Q. How do you know that? 20 A. Because it was in with -- so there are a 21 bunch of e-mails, at least in our production, related 22 to Mr. Halbig's litigation with Mr. Pozner, which is 23 not connected to this case. He appears that he -- and 24 I don't know if you see that Mr. Halbig e-mails very 25 numerous people in a lot of his e-mails.</p>	<p>164</p> <p>1 Mr. Halbig and Mr. Pozner's attorney relating to that 2 litigation is specifically referencing that background 3 check. 4 Q. Okay. But -- but all you know is that 5 there's -- something went on between Pozner and -- and 6 Halbig. And so you assume that that document that you 7 have must have come from that; right? Is that -- 8 there's nothing you've done to independently run down 9 -- 10 A. I haven't independently verified it, no. I 11 -- I -- and I don't see the actual e-mail that it's 12 connected to. 13 Q. Okay. This brings me to my next point, is 14 InfoWars knew about the legal action between Mr. Pozner 15 and Mr. Halbig; right? 16 A. Well, this goes back to issues relating to 17 not opening Mr. Halbig's e-mails. So, I mean, as I sit 18 here now, yes, I am aware of it because I reviewed the 19 production. But at the time, I mean, pursuant to my 20 conversations with numerous employees, his e-mails were 21 not being opened. 22 Q. There are -- okay. Let's -- first of all, 23 there are other places the company can get information 24 about that lawsuit other than Mr. Halbig; right? 25 A. Sure.</p>
<p>163</p> <p>1 Q. Sometimes, uh-huh. 2 A. So it appears that he has sent to us a lot of 3 the information concerning that litigation. And I -- 4 in the materials that are in our production, there were 5 a bunch of litigation materials connected to that case. 6 And I think it was in there. I also saw some e-mail 7 chains between Halbig and Mr. Pozner about -- about 8 this particular background check. 9 Q. Okay. So when you say you think it came from 10 the litigation, that's because it was in proximity, 11 physical proximity in the production to documents that 12 related to that litigation? 13 A. Right. 14 Q. All right. You understand with me, though, 15 you've gone through, I hope, enough InfoWars documents 16 to know that there's not really much of a rhyme or 17 reason to the order of those documents? 18 A. I see that. 19 Q. Right. So there could be just random 20 documents thrown in the middles of other places. So 21 I'm wondering why do you think that that's from 22 litigation if you've never run down and figured that 23 out? 24 A. The reason is because some of those e-mails, 25 communications between Mr. Halbig and Mr. Pozner and</p>	<p>165</p> <p>1 Q. Just first of all. 2 A. You can do a Google search on it. 3 Q. So let me ask you that. Has the company 4 gotten information from anybody else about that 5 lawsuit? 6 A. No. 7 Q. Okay. And do you think that, or you know 8 that? I'm trying -- have you verified that? I went 9 through -- 10 A. I don't see anything in the production that 11 would have indicated that we did any independent 12 research on that. 13 Q. Okay. 14 A. But I didn't talk to anybody relating to that 15 specific litigation. 16 Q. All right. 17 A. My information on that litigation just comes 18 from the production. 19 Q. Okay. Let's look at something in there. 20 Okay. You read Ms. Karpova's deposition; right? 21 A. Yes. 22 Q. So you saw the discussion in that deposition 23 about Mr. Halbig and Mr. Pozner's lawsuit; right? 24 A. Is this the one in Florida? 25 Q. Yeah, that lawsuit would have been in</p>



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<p>166</p> <p>1 Florida.</p> <p>2 A. Okay. Yes.</p> <p>3 Q. So you did know things about that from</p> <p>4 Ms. Karpova's deposition?</p> <p>5 A. Yes.</p> <p>6 Q. So you know that the answers you just gave</p> <p>7 about people not giving any information to the company</p> <p>8 about those lawsuits, that's not right. That was</p> <p>9 discussed in Ms. Karpova's deposition; right?</p> <p>10 A. What are you referring to?</p> <p>11 Q. I'll give it to you --</p> <p>12 A. Sure.</p> <p>13 Q. -- since we'll go through that again. What</p> <p>14 exhibit number are we on?</p> <p>15 A. 6.</p> <p>16 Q. Let's go to 7. Okay. This is an exhibit</p> <p>17 that I assume you've read from Ms. Karpova's --</p> <p>18 A. Oh, no. It would be 6, I'm sorry. Because</p> <p>19 we were on --</p> <p>20 Q. Got you.</p> <p>21 A. Yeah.</p> <p>22 Q. Okay. I'm going to hand you Exhibit 6 --</p> <p>23 THE COURT REPORTER: We've done 6</p> <p>24 already.</p> <p>25 THE WITNESS: Where's 6?</p>	<p>168</p> <p>1 e-mails like this about -- not just about Halbig, but</p> <p>2 various people that we either have calling in on the</p> <p>3 station or various people that we're reporting on or</p> <p>4 commentators or, you know, whatever the case may be.</p> <p>5 Q. Uh-huh.</p> <p>6 A. This document is very common. This type of</p> <p>7 thing would be common. And when I asked Mr. Dew about</p> <p>8 not only this document, but I believe there's one or</p> <p>9 two other comments from other people about Mr. Halbig's</p> <p>10 credentials, whether anything was done or conveyed to</p> <p>11 anybody else internally about it. And the answer is</p> <p>12 no.</p> <p>13 So I -- I agree with you that this was</p> <p>14 forwarded to somebody, but I don't think that anybody</p> <p>15 would have necessarily followed up with it. Does that</p> <p>16 make sense?</p> <p>17 Q. So Nico sent it -- Nico is a producer; right?</p> <p>18 A. Was he a producer?</p> <p>19 Q. I think at that time.</p> <p>20 A. Right. So I -- well, I think his more</p> <p>21 specific job description, even though there's no</p> <p>22 official job descriptions, was that he -- he was the</p> <p>23 person who was coordinating The Alex Jones Show. But</p> <p>24 yes, I -- so I see that it was forwarded to Nico.</p> <p>25 Q. No, actually, it wasn't. It was sent from</p>
<p>167</p> <p>1 MS. BLOTT: Where is it?</p> <p>2 THE COURT REPORTER: I've -- I marked</p> <p>3 it down on my sheet that you admitted Exhibit 6. This</p> <p>4 is it.</p> <p>5 MR. BANKSTON: Got you.</p> <p>6 THE WITNESS: Okay. I'm sorry, you're</p> <p>7 right.</p> <p>8 Q. (BY MR. BANKSTON) Okay.</p> <p>9 A. They were out of order.</p> <p>10 Q. Okay. This is a document that was read</p> <p>11 verbatim in Ms. Karpova's deposition. Are you familiar</p> <p>12 with this document, before you --</p> <p>13 (Exhibit No. 7 marked.)</p> <p>14 A. Let me -- can I read it?</p> <p>15 Q. (BY MR. BANKSTON) You may.</p> <p>16 A. Okay.</p> <p>17 Q. Okay. So this is a document that, contrary</p> <p>18 to your last answer, is somebody from outside the</p> <p>19 company giving the company information about Wolfgang</p> <p>20 Halbig's legal action; right?</p> <p>21 A. That's what appears. And I did read this in</p> <p>22 connection with Ms. Karpova's deposition.</p> <p>23 Q. I understand that. Doesn't really match your</p> <p>24 testimony, though, does it?</p> <p>25 A. I disagree. So the company receives a lot of</p>	<p>169</p> <p>1 Nico.</p> <p>2 A. Oh, yes. I'm sorry. From Nico to Rob. Yes.</p> <p>3 Q. Right. Okay. To --</p> <p>4 A. Right.</p> <p>5 Q. And Rob -- Rob Dew is nightly news director?</p> <p>6 A. I don't know that that's his title or was his</p> <p>7 title at the time. So this looks like it was --</p> <p>8 Q. Okay.</p> <p>9 A. -- sent to a general mailbox,</p> <p>10 mediacontacts@infowars.</p> <p>11 Q. Right. But what --</p> <p>12 A. And then it was being monitored and forwarded</p> <p>13 along to Rob. Whether Rob saw it or did anything with</p> <p>14 it, I don't know.</p> <p>15 Q. We know Nico saw it. We know Nico did</p> <p>16 something with it.</p> <p>17 A. Nico saw it, right.</p> <p>18 Q. And he did something with it?</p> <p>19 A. Aside from forwarding it to Rob?</p> <p>20 Q. Well, that's something, isn't it?</p> <p>21 A. Well, if -- forwarded it to Rob.</p> <p>22 Q. And then told him, here are some comments on</p> <p>23 Halbig's last interview.</p> <p>24 A. Right. Nico's not controlling -- Nico</p> <p>25 doesn't control the content of anything that's done on</p>

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<p style="text-align: right;">170</p> <p>1 air. Or never did.</p> <p>2 Q. Okay. What I'm trying to get at, this is an</p> <p>3 internal editorial discussion about Mr. Halbig's</p> <p>4 appearance on the show?</p> <p>5 A. No.</p> <p>6 Q. Can you tell me why you would take issue with</p> <p>7 that?</p> <p>8 A. Because I don't -- because I don't agree with</p> <p>9 the term editorial discussion. And I don't know</p> <p>10 whether there was an actual discussion.</p> <p>11 Q. Okay. Yeah. So let's go ahead and break</p> <p>12 that down, first of all. He's making some comments</p> <p>13 here to Rob and directing him to see those comments.</p> <p>14 He's saying, hey, look. Here's some comments from</p> <p>15 Halbig's last interview; right?</p> <p>16 A. It's not telling him to look at it. It's</p> <p>17 just here -- some comments on Halbig's last interview.</p> <p>18 It's not telling him to do anything with that</p> <p>19 information.</p> <p>20 Q. You just said it's not -- it's not telling</p> <p>21 him to look at it. Do you think that's a forthright</p> <p>22 answer, Ms. Paz?</p> <p>23 A. It says some comments on Halbig's last</p> <p>24 interview. It's not telling him whether to do anything</p> <p>25 with it or anything like that. It's just --</p>	<p style="text-align: right;">172</p> <p>1 So there's no daily group roundtable as to</p> <p>2 what we should cover and what we shouldn't cover or how</p> <p>3 we should cover it or how we shouldn't cover it. So</p> <p>4 that's why I don't agree with the term.</p> <p>5 Q. So when it comes down to that topic,</p> <p>6 editorial discussions on Sandy Hook, I would take it</p> <p>7 that would have been the easiest topic for you to</p> <p>8 prepare for because there are none; right?</p> <p>9 A. We don't have -- that's correct. We don't</p> <p>10 have editorial discussions.</p> <p>11 Q. Okay.</p> <p>12 A. There's no such thing as an editorial</p> <p>13 discussion.</p> <p>14 Q. That's -- that's what Ms. Karpova told me</p> <p>15 too. So I'm glad y'all are on the sage page there,</p> <p>16 that y'all are going to go with that. Before this</p> <p>17 lawsuit -- okay. Hold on here. Hold on.</p> <p>18 In terms of the company, I believe what you</p> <p>19 testified for me earlier is notwithstanding that e-mail</p> <p>20 we just saw, which, for instance, you say there was no</p> <p>21 directions to do anything and nobody may have followed</p> <p>22 up on it or anything, the company did not take an</p> <p>23 interest, any sort of specialized interest or publish</p> <p>24 any information about the lawsuit involving Mr. Halbig</p> <p>25 and Mr. Pozner. Is that what you're saying?</p>
<p style="text-align: right;">171</p> <p>1 Q. I'm not saying about whether doing that.</p> <p>2 A. Okay.</p> <p>3 Q. You know that he intended him to look at it;</p> <p>4 right?</p> <p>5 MS. BLOTT: Objection. Argumentative.</p> <p>6 She's asked and -- or answered the</p> <p>7 question.</p> <p>8 MR. BANKSTON: And I'm -- I'm asking</p> <p>9 her.</p> <p>10 Q. (BY MR. BANKSTON) Do you think that answer</p> <p>11 was reasonable?</p> <p>12 A. Yes, I do.</p> <p>13 Q. Okay. What is an editorial discussion?</p> <p>14 A. Your definition of editorial discussion or</p> <p>15 mine?</p> <p>16 Q. Absolutely not mine. No, yours. Because you</p> <p>17 were the one who didn't object to these topics and then</p> <p>18 told the court you were going to go get prepared on</p> <p>19 them. I want to know what you say editorial discussion</p> <p>20 is.</p> <p>21 A. The company doesn't really adhere to the term</p> <p>22 editorial discussion, which is why I said I didn't</p> <p>23 agree with the term. So, I mean, in terms of editorial</p> <p>24 discussions as a big media company would term it, the</p> <p>25 company doesn't really engage in editorial discussions.</p>	<p style="text-align: right;">173</p> <p>1 A. I haven't seen any information published</p> <p>2 about that particular lawsuit.</p> <p>3 Q. Have you watched the March 4th, 2015 video</p> <p>4 with Mr. Halbig that was in the plaintiffs' petition?</p> <p>5 A. Let me see. What date is that, March --</p> <p>6 Q. March 4th, 2015.</p> <p>7 A. And you don't know the ID number for that?</p> <p>8 Q. No, I don't. I got a title for it, but</p> <p>9 I don't -- yeah.</p> <p>10 A. Do you know what the title is?</p> <p>11 Q. New Bombshell Information Inbound.</p> <p>12 A. Okay. Yes. So March 4th, I did -- yes, I</p> <p>13 did review that.</p> <p>14 Q. All right. What's that bombshell</p> <p>15 information? You know what that is; right?</p> <p>16 A. Let -- so just for reference, the company's</p> <p>17 ID number is _7ib5WkULBY.</p> <p>18 Q. Okay.</p> <p>19 A. So if I could just go to my notes regarding</p> <p>20 that. At some point, I ran out of tabs, so -- sorry, I</p> <p>21 just want to go through my notes. And I ran out of</p> <p>22 tabs, so I apologize.</p> <p>23 Q. That's all right. We'll take as long as we</p> <p>24 need.</p> <p>25 A. Sure. Okay. I found it. Thank you.</p>

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<p style="text-align: right;">174</p> <p>1 Q. Okay. So now, we're talking about the March 2 4th, 2015 video with the New Bombshell Information 3 Inbound. 4 A. Yes. 5 Q. You know what the bombshell information is; 6 right? 7 A. Yes. 8 Q. That's the subpoenas in that lawsuit with 9 Mr. Pozner and Mr. Halbig; right? 10 A. Just let me review my notes for just one 11 second. 12 Q. Sure. 13 A. No. Well, so -- 14 Q. I mean, I'm quoting you a question and answer 15 of Mr. Jones. 16 A. They -- they asked -- so -- and here's the 17 problem. The -- there are subpoenas that were also 18 issued in connection with the FOIA litigation. 19 Q. That's right. 20 A. Which is not the same thing as the Florida 21 litigation. And so they -- I thought -- my 22 understanding was they were talking about subpoenas 23 relating to the FOIA -- 24 Q. Maybe we'll pull up that video again. 25 A. -- case. But I could be mistaken. But --</p>	<p style="text-align: right;">176</p> <p>1 these things Mr. Halbig was talking about -- 2 A. Yes. 3 Q. -- that InfoWars is putting on the air, did 4 you talk to Mr. Halbig about them? 5 A. No, I have never spoken to Mr. Halbig. 6 Q. Did you try? 7 A. No. 8 Q. Okay. Why was the company interested in the 9 legal action between Pozner and Halbig? 10 A. Why? 11 Q. Uh-huh. 12 A. I think during this time period, it was in 13 the coverage of -- it was -- this time period 14 simultaneously was the time period that the FOIA 15 hearings were happening or going to happen. And what 16 usually we do as far as the -- what is in the news 17 cycle, we talk about what's in the news cycle. And so 18 this would have been something that was in the news 19 cycle. 20 Q. Mr. Pozner's lawsuit was in the news cycle? 21 A. I don't know. 22 Q. All right. That's -- I'm not asking you 23 about the FOIA stuff. I get why they were interested 24 in the FOIA stuff. 25 A. The FOIA stuff was in the news cycle.</p>
<p style="text-align: right;">175</p> <p>1 Q. Yeah. Because, I mean, what happens in that 2 video, I'll just tell you, is he says -- asks him what 3 the bombshell information is, and he says about the 4 subpoenas. 5 A. Uh-huh. 6 Q. And he's talking about Mr. Pozner's lawsuit. 7 And then he says, and also, I got this other stuff 8 going on up with the FOIA stuff too. 9 A. Right. 10 Q. So that's real interesting too. 11 A. Right. They -- we did -- we did discuss on 12 many occasions in multiple videos the FOIA litigation. 13 I think it was over, like, three hearing dates. 14 Q. Right. But what I'm asking is, the bombshell 15 information here is that he had served his subpoenas to 16 Mr. Pozner? 17 A. So I don't recall -- in my notes, just based 18 on my notes, I didn't write down the name and I don't 19 know if the name of the case was ever specified. But 20 like I said, there was a lot of litigation and that's 21 what they were talking about was the subject of it was 22 that subpoenas had been issued. 23 Q. All right. Did you tell -- 24 A. But I'm not sure which case, is my point. 25 Q. For these notes that you're taking about</p>	<p style="text-align: right;">177</p> <p>1 Q. Right. Well, I mean, I'm not sure. When you 2 say news cycle, what does that mean that FOIA stuff was 3 in the news cycle? 4 A. So when I say news cycle, that's a good 5 question. So news cycle means that they source every 6 day from a variety of different places. And so every 7 day, they will kind of scan, you know, for example, 8 Twitter, what is trending. They'll -- they'll source 9 various news sites. 10 They'll source social media as to what's 11 trending on social media. And then they'll decide what 12 is trending in the news cycle that way. 13 Q. Who is -- who is in the news cycle -- who is 14 covering FOIA besides InfoWars and Dan Bidondi? 15 A. You mean another news source? 16 Q. Yeah. How did it get in the news cycle? 17 A. I don't know which source are you -- are you 18 referring to. Are you referring to, like, a news media 19 source, or one of the sources that they are sourcing 20 for their information? 21 Q. No. I mean, you say they were discussing it 22 because -- FOIA because it was in the news cycle. 23 A. Right. It was relevant at the time because 24 it was something that they had seen in the news cycle. 25 Q. Where did they see it?</p>

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<p>178</p> <p>1 A. I don't know. I'm not sure.</p> <p>2 Q. All right. Because I --</p> <p>3 A. They don't mention it -- the video.</p> <p>4 Q. There's no reporters at that FOIA hearing</p> <p>5 besides Dan Bidondi. And Mr. Halbig's there along with</p> <p>6 her -- his lawyer. I'm just trying to understand who's</p> <p>7 covering that.</p> <p>8 A. But that doesn't mean it's not in the news</p> <p>9 cycle. That doesn't mean that there's not Internet</p> <p>10 chatter about it. And that was a source of what</p> <p>11 they --</p> <p>12 Q. Got you.</p> <p>13 A. -- found to be trending. So just because</p> <p>14 there wasn't a newspaper article there doesn't mean</p> <p>15 that it wasn't trending on the Internet or trending in</p> <p>16 social media or something that -- an interest was put</p> <p>17 forth in some way.</p> <p>18 Q. Let me -- let me make sure. Do you have any</p> <p>19 idea sitting here today whether it was trending on</p> <p>20 social media, or is that just a theoretical popularity?</p> <p>21 A. This particular -- this particular article?</p> <p>22 Q. Uh-huh.</p> <p>23 A. No, I don't.</p> <p>24 Q. All right. So when you say they were</p> <p>25 covering FOIA because it was trending in the news</p>	<p>180</p> <p>1 they might be interested in the FOIA hearing.</p> <p>2 A. Yes.</p> <p>3 Q. And we know that they sent a reporter up</p> <p>4 there, Halbig went up there, we -- we know about that.</p> <p>5 What I'm interested in is why is the company interested</p> <p>6 in that Florida lawsuit between Mr. Pozner and</p> <p>7 Mr. Halbig, which has nothing to do with the FOIA. Why</p> <p>8 is it interested in that?</p> <p>9 A. So at this point in time, Mr. Jones</p> <p>10 references specifically the copyright claims that were</p> <p>11 going on in the YouTube -- for YouTube. So it was</p> <p>12 interested in the actions that Mr. Pozner was taking.</p> <p>13 He specifically references the copyright claims in that</p> <p>14 video. And so that particular aspect of it, I think,</p> <p>15 would have made Mr. Jones continuing to be interested</p> <p>16 in it.</p> <p>17 Q. Okay. So we can agree that the company was</p> <p>18 to some extent following that lawsuit?</p> <p>19 A. Sure, to the extent that Mr. Halbig came on</p> <p>20 and talked about the subpoenas that were being issued.</p> <p>21 Q. And to the extent that Nico was sending</p> <p>22 information to Rob Dew about the lawsuit.</p> <p>23 A. I don't know that Rob had ever read it. But</p> <p>24 I -- but it is in the company's e-mail, so yes.</p> <p>25 Q. Right. And, I mean, Nico certainly read it.</p>
<p>179</p> <p>1 cycle, you have no idea if that's true?</p> <p>2 A. I'm saying that this is their general</p> <p>3 procedure as how things are covered.</p> <p>4 Q. Right. But you don't understand how they</p> <p>5 covered FOIA; right?</p> <p>6 A. This -- the FOIA hearings?</p> <p>7 Q. Yeah.</p> <p>8 A. How it came into their purview?</p> <p>9 Q. Uh-huh.</p> <p>10 A. I don't know.</p> <p>11 Q. Right. And so if Mr. Halbig was</p> <p>12 communicating with Nico or anybody else about how to</p> <p>13 set this up and make this happen, you haven't seen any</p> <p>14 of that?</p> <p>15 A. No, I don't think that's accurate. So I -- I</p> <p>16 do know that they were in communication about</p> <p>17 coordination of getting him onto the air. I do know</p> <p>18 that.</p> <p>19 Q. Okay. All right.</p> <p>20 A. But -- but that would have only had happened</p> <p>21 if they -- somebody had made a determination that this</p> <p>22 was relevant or worth talking about. And then also,</p> <p>23 caveat to that is, these are based on -- well, whoever</p> <p>24 was interested in it at that time; right? So --</p> <p>25 Q. All right. Well, we've gotten a lot of why</p>	<p>181</p> <p>1 We know that.</p> <p>2 A. It appears so.</p> <p>3 Q. And was interested enough into it to turn it</p> <p>4 on over to the nightly news director; right?</p> <p>5 A. I don't know what his policies and practices</p> <p>6 are regarding forwarding information. I don't know if</p> <p>7 he just forwards everything regarding a particular</p> <p>8 guest. He knew that Rob would have been interested in</p> <p>9 that particular guest and so forwarded it. So I don't</p> <p>10 know what his policy is.</p> <p>11 Q. And you didn't ask to find out what that</p> <p>12 policy was; right?</p> <p>13 A. I didn't ask him that, no.</p> <p>14 Q. Now, before this lawsuit was filed, the</p> <p>15 company knew that Mr. Pozner was being harassed by</p> <p>16 Mr. Halbig; right?</p> <p>17 A. I'm sorry, repeat the question.</p> <p>18 Q. Yeah. Before this lawsuit was filed, the</p> <p>19 company knew that Mr. Pozner was being harassed by</p> <p>20 Mr. Halbig?</p> <p>21 A. I don't -- I don't know that, no. Because I</p> <p>22 think we talked about earlier, I don't know at what</p> <p>23 point anybody became aware of what he was doing just</p> <p>24 because they stopped reading his e-mails.</p> <p>25 Q. Because he's kind of crazy; right?</p>

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<p>182</p> <p>1 A. I think that his e-mail communications got 2 more and more bizarre as time gone -- went on. 3 Q. So we -- 4 A. I think that was the word that Nico used was 5 bizarre. 6 Q. Hold on. You've -- you've read a lot of 7 Wolfgang Halbig e-mails, I'm taking it? 8 A. I did, yes. 9 Q. So you've read e-mails from him, like, in 10 2014 and you've probably read e-mails from him up in 11 2017; right? 12 A. Yes, I've read a lot of e-mails. 13 Q. Are you going to tell me that the e-mails he 14 sent in 2014 are any less crazy than the e-mails he 15 sent in 2017? 16 A. I think they've gotten crazier. 17 Q. Okay. But we can both agree that there are 18 plenty of e-mails he sent in 2014 that the company did 19 in fact read and thanked him for -- 20 A. Sure. 21 Q. -- that are -- that are crazy? 22 A. Yes. 23 Q. Okay. And you understand InfoWars, of 24 course, you -- you may not know if they're even aware 25 of them, but they produced e-mails where Mr. Pozner was</p>	<p>184</p> <p>1 Q. Let's do both, sure. 2 A. I think that that would be an accurate 3 description. I think the company does make a claim 4 that he is a advocate in connection with the First 5 Amendment and the Second Amendment. 6 Q. Okay. Do you -- does the company have any 7 facts, any evidence, any knowledge whatsoever that 8 Mr. Pozner has ever said a word publicly ever about 9 guns? 10 A. I don't know the answer to that. But also, 11 there is, I mean, I know that they're divorced, but his 12 ex-wife has made some comments and political activism 13 regarding gun control. 14 Q. Come on, you know that's not relevant to my 15 question. You have to know that. I mean, I -- I -- 16 look. I know you're not an uneducated witness. You're 17 a lawyer, you're an attorney. And when I sit here and 18 -- and I ask you, does the company have any -- any 19 evidence that Mr. Pozner has ever said any information 20 about guns and you start speculating about what his 21 ex-wife said. That -- 22 A. I'm not speculating. I've reviewed documents 23 about that. But I understand your question. 24 Q. Let's put it this way. No, and I don't think 25 you do. Because what I'm asking you is you start</p>
<p>183</p> <p>1 being harassed by Mr. Halbig? 2 A. We have produced those -- those types of 3 e-mails, yes. 4 Q. Okay. But you sitting here today don't even 5 know if the company even knew about them; right? 6 A. At the time, no. I don't know. 7 Q. Okay. 8 A. We know about them now, obviously. 9 Q. Sure. Sure. When did you find out? 10 A. Find out what? 11 Q. When the company find out that Mr. Halbig was 12 harassing Mr. Pozner? 13 A. I don't know. I'm not sure if they reviewed 14 the e-mails as -- as a result of this lawsuit, going 15 back. But as I said, he stopped coming onto the air. 16 It was a discrete period of time and then he wasn't on 17 the air anymore. And then there weren't any real 18 communications with him. 19 Q. All right. Does the company contend 20 Mr. Pozner is a gun regulation advocate? 21 A. Did we -- did we talk about this? 22 Q. We haven't talked about Mr. Pozner yet, 23 huh-uh. 24 A. Mr. Pozner individually, or in his connection 25 with the HONR Network, or both?</p>	<p>185</p> <p>1 giving me information speculating about what 2 Mrs. Pozner's statements at some point in her life 3 reflect on what Mr. Pozner may or may not be in terms 4 of a gun regulation advocate. You know that's not 5 relevant; right? 6 A. I don't think that it's not relevant. But I 7 think that in connection with Sandy Hook and the Second 8 Amendment, HONR in -- specifically, I don't have any 9 information as I sit here today about Second Amendment. 10 First Amendment, yes. Second Amendment, I don't have 11 any information as I sit here today. 12 Q. Well, we just talked about -- you had told 13 that the company had reason to say in the February 14 12th, 2015 video that HONR was engaged in anti Second 15 Amendment activities. You remember us talking about 16 that? 17 A. That's not what I said. What I said was, 18 Mr. Dew had an opinion about that that he aired and 19 that was his opinion. 20 Q. All right. So here's what I'm trying to get 21 at. What facts inform that opinion? 22 A. And as we talked about earlier, I told you I 23 didn't know that. 24 Q. Okay. But the problem is, is that I believe 25 that you testified that the company just now does</p>

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<p>186</p> <p>1 interpret it in a way that Mr. Pozner is a Second 2 Amendment advocate. Does it or doesn't it? I mean, 3 that's what I'm trying to get at. 4 A. Like I said, I don't -- I can't point to any 5 specific material as I sit here today regarding gun -- 6 the gun control aspect of it. 7 Q. Okay. Has your husband ever said anything 8 you don't agree with? 9 A. My husband? 10 Q. Yeah. 11 A. Sure. 12 MS. BLOTT: Objection. Argumentative. 13 Outside the scope. 14 Q. (BY MR. BANKSTON) Do you think you should be 15 -- do you think you should be held to have participated 16 in everything that your husband said? 17 A. No. 18 Q. Okay. You know what information the company 19 has on Veronique De La Rosa? 20 A. As far as Ms. De La Rosa goes, I am aware of 21 the comments that she made in connection with gun 22 control in connection with her son's funeral and the 23 governor, I believe, attending the funeral. I believe 24 there might also -- there was also an interview. And 25 aside from that, I -- I don't think I'm aware of</p>	<p>188</p> <p>1 A. I -- I want to say I saw an article about it, 2 and then the interview. 3 Q. Which -- what are you talking about? 4 A. She did -- did an interview. Was that the 5 interview with -- with Anderson Cooper? 6 Q. She's done an interview with Anderson Cooper, 7 yeah. 8 A. That's the only interview that I've seen. 9 Q. You saw that? 10 A. Yes. 11 Q. Okay. Where did you get that video? 12 A. I believe that was a video that we had posted 13 and was referenced numerous times by Mr. Jones on the 14 show. 15 Q. No, no. I understand Mr. Jones many, many 16 times -- 17 A. Yes. 18 Q. -- has posted a video of the last five 19 seconds of that interview with -- 20 A. Right. 21 Q. -- no sound where Mr. Anderson Cooper's head 22 is turning and his nose disappears; right? 23 A. Yes. 24 Q. But there's nothing -- Ms. De La Rosa isn't 25 talking in those; right?</p>
<p>187</p> <p>1 anything else. 2 Q. How did you -- what did you do to find out 3 what the company knows about Ms. De La Rosa? 4 A. As we discussed earlier, I did do a search in 5 the documents that were produced. I did talk to 6 Mr. Jones about Ms. De La Rosa. 7 Q. Do you -- so when you search, you just search 8 for Veronique De La Rosa? 9 A. Yes, or -- or Pozner. I didn't know what 10 name it would be under because I wasn't sure when their 11 divorce happened, so -- 12 Q. I'm going to correct you once again. That's 13 Pozner is their names. 14 A. Oh, I'm sorry. Pozner, yes. 15 Q. Right. Their names are Pozner. 16 A. So I -- like I said, I didn't know when their 17 divorce happened, so I didn't know which name she was 18 using. 19 Q. Okay. And did you find any documents? 20 A. Aside from the documents that we listed? 21 Q. What do you mean, the documents you listed? 22 What does that mean? 23 A. I mean, the information in connection with 24 her statements at the funeral on gun control. 25 Q. You saw some documents about that?</p>	<p>189</p> <p>1 A. No, no. It was mostly just shots of Anderson 2 Cooper. 3 Q. Right. 4 A. Right. 5 Q. So how did you see the interview? 6 A. I don't think I watched the entire interview. 7 I think that's the entirety -- my knowledge is just 8 what was posted about that interview. 9 Q. There's -- I don't understand, Ms. Paz. 10 There's nothing about guns -- I mean, Ms. De La Rosa 11 isn't talking. So how do you understand what she said? 12 A. I'm sorry, I don't understand the question. 13 Q. When -- when Ms. De La Rosa is featured on 14 InfoWars -- 15 A. Right. 16 Q. -- in all these videos of -- 17 A. Right. 18 Q. -- Anderson Cooper's nose disappearing -- 19 A. Right. 20 Q. -- she's not talking. 21 A. Right. But the topic -- 22 Q. So how do you know what she said? 23 A. But that topic of that conversation, it was 24 related to Anderson Cooper's coverage of the shooting. 25 Q. Sure.</p>

<p style="text-align: right;">190</p> <p>1 A. Right.</p> <p>2 Q. So how do you know she was talking about</p> <p>3 guns?</p> <p>4 A. I think that that was what was represented as</p> <p>5 the topic of that interview.</p> <p>6 Q. Represented by who?</p> <p>7 A. By the media.</p> <p>8 Q. Why do you -- I'm trying to --</p> <p>9 A. -- reason it was covered.</p> <p>10 Q. Look, I know -- you don't have any personal</p> <p>11 knowledge. You don't -- you -- you -- you had nothing</p> <p>12 to do with this thing until two weeks ago. So when you</p> <p>13 come in here and tell me that -- that Ms. De La Rosa</p> <p>14 was talking about guns in an interview, where did you</p> <p>15 get that?</p> <p>16 A. As I said, I think that was the topic of the</p> <p>17 conversation of the interview.</p> <p>18 Q. I -- I know you're saying that.</p> <p>19 A. Yes, that's my answer.</p> <p>20 Q. Where did you -- where did you get that piece</p> <p>21 of information?</p> <p>22 A. From the videos that I watched.</p> <p>23 Q. All right. So what video does that come</p> <p>24 from? I don't understand, because like we've said,</p> <p>25 you've never seen --</p>	<p style="text-align: right;">192</p> <p>1 Q. I -- I -- I don't -- I'm not asking you what</p> <p>2 you understood. I'm wondering how did you arrive at</p> <p>3 that understanding?</p> <p>4 A. And I testified my basis for my conclusion</p> <p>5 was watching the videos that InfoWars posted.</p> <p>6 Q. Okay. The InfoWars videos.</p> <p>7 A. Yes.</p> <p>8 Q. All right. So let us talk about those videos</p> <p>9 you watched.</p> <p>10 A. Sure.</p> <p>11 Q. What part of those videos, any of those</p> <p>12 videos, anything from any of those videos, who said or</p> <p>13 what part of it did you glean from that that interview</p> <p>14 was about guns?</p> <p>15 A. That was the reason why that was being</p> <p>16 covered.</p> <p>17 Q. I don't -- you've got to understand there's a</p> <p>18 disconnect here. I heard --</p> <p>19 A. I don't understand the disconnect.</p> <p>20 Q. I a hundred percent understand your testimony</p> <p>21 that you believe based on some information you saw that</p> <p>22 that topic of that interview was about guns. I</p> <p>23 understand that completely, hundred percent. That for</p> <p>24 some reason or another, an interview that you knew</p> <p>25 nothing about two weeks ago, you now believe has</p>
<p style="text-align: right;">191</p> <p>1 A. Comes from the videos that were produced by</p> <p>2 InfoWars.</p> <p>3 Q. Okay. So at what -- what point was it ever</p> <p>4 -- did you see Ms. De La Rosa ever talking about guns?</p> <p>5 A. Did I personally watch the entirety of that</p> <p>6 video, that interview?</p> <p>7 Q. I -- that's not what I'm asking, actually.</p> <p>8 Because now, you're telling me that you got this</p> <p>9 information not from the interview itself, which</p> <p>10 I believe you told me you watched, and then actually we</p> <p>11 just saw the -- saw that.</p> <p>12 A. No. I watched the video of Anderson Cooper.</p> <p>13 Q. Right.</p> <p>14 A. That's what I watched.</p> <p>15 Q. Right. So now you're telling me that</p> <p>16 somehow, you got it from the InfoWars videos that</p> <p>17 Ms. De La Rosa was talking about guns. Where did you</p> <p>18 get that?</p> <p>19 A. No. What I said was, that the reason that</p> <p>20 interview was covered was because the topic of it from</p> <p>21 Anderson Cooper's perspective was guns.</p> <p>22 Q. Who said that? Who said that the topic of</p> <p>23 Anderson Cooper's interview from that perspective is</p> <p>24 guns?</p> <p>25 A. That's what I understood that the topic was.</p>	<p style="text-align: right;">193</p> <p>1 something to do with guns.</p> <p>2 And I'm trying to figure out what -- and I</p> <p>3 know you say that because it came from the videos. And</p> <p>4 I'm trying to figure out what in those videos at any</p> <p>5 point led you to the conclusion that Ms. De La Rosa was</p> <p>6 talking about guns?</p> <p>7 A. And again, I'm going to testify -- and I</p> <p>8 understand you don't understand my answer. I can't</p> <p>9 help you understand it other than to say that I watched</p> <p>10 the videos, that it appears that the purpose and reason</p> <p>11 why Mr. Jones wanted to cover it was because that</p> <p>12 interview was based on that topic. But --</p> <p>13 Q. Again, did Mr. -- is this something you</p> <p>14 gained from something Mr. Jones said, something Ms. De</p> <p>15 La Rosa said, something another person said? I don't</p> <p>16 -- I don't understand where this is coming from that</p> <p>17 you just say, I watched these videos and now I</p> <p>18 understand the purpose of that interview was about</p> <p>19 guns.</p> <p>20 MS. BLOTT: Objection. Asked and</p> <p>21 answered.</p> <p>22 Q. (BY MR. BANKSTON) Do you know -- do you know</p> <p>23 what person that comes from?</p> <p>24 A. Do I know which person it comes from?</p> <p>25 Q. Yeah, why you believe that, in other words.</p>

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<p style="text-align: right;">194</p> <p>1 The -- the information, who it came from that that's 2 why you believe that. 3 A. Like I said, it would have been in the 4 videos. So if the particular video was being hosted by 5 Mr. Jones, he thought that that video was relevant for 6 that purpose, so it probably came from Mr. Jones just 7 based on the videos. 8 Q. Okay. How do you know what Mr. Jones 9 thought? Is he -- is this something you got from an 10 interview with him or something you saw in a video? 11 A. No. I'm just -- like I said, the totality of 12 my knowledge is based on the videos. 13 Q. Okay. And so that video itself, you -- do 14 you remember any specific things Mr. Jones said in that 15 video about guns? 16 A. Which -- which video? Because he talks about 17 -- 18 Q. I don't know. 19 A. -- that interview a number of times. 20 Q. I don't know. You're telling me that that's 21 where you came from it. 22 A. Well, so he talks about the -- well, most of 23 the subsequent information that he talks about is just 24 about Anderson Cooper and the nose disappearing. But 25 as far as the first time that he references that video,</p>	<p style="text-align: right;">196</p> <p>1 Q. -- being gun related. Is that a -- is that a 2 factual claim or is that an editorial opinion? What do 3 you think that is? 4 A. You mean is it Mr. Jones' opinion? 5 Q. Or what -- it's tough because I don't really 6 know what you're drawing this from still. So I'm -- 7 I'm going to say whatever information it is that you're 8 drawing that Free Speech Systems put in a video that 9 makes you think that that interview is about guns. Is 10 that a fact or an editorial opinion that you're drawing 11 that from? 12 A. Well, so I don't know that I would 13 necessarily term it as an editorial opinion. But I 14 think that broadly speaking, the company's coverage of 15 Sandy Hook was surrounding gun control and how in the 16 aftermath of the tragedy, there was a push for gun 17 control. 18 So that underlying coverage would inform that 19 opinion. I don't know that I would necessarily term it 20 editorial discussions or opinions. 21 Q. Sure. Based on what the company knows -- 22 okay. Again, talking about what it knows. First of 23 all, before we move on from Veronique, I just want to 24 make sure -- I may have gotten confused. In terms of 25 documents that you have reviewed relating to Veronique</p>
<p style="text-align: right;">195</p> <p>1 mostly what he talks about is -- is the nose 2 disappearing. 3 But I think the reason, like I said, the 4 topic of it, that's the reason why he covered it. 5 Q. Do you -- do you recall any InfoWars videos 6 that you've watched during this litigation -- 7 A. Sure. 8 Q. -- in which you have seen Anderson Cooper 9 talking about guns? 10 A. No. Just because I think that the videos 11 that they posted didn't have any sound. The purpose of 12 showing the video and the argument that was made of the 13 video was that his nose was disappearing and Alex's 14 opinion that it was greenscreened or bluescreened, I 15 can't remember which. 16 Q. Okay. 17 A. But I don't think that that -- Anderson 18 Cooper had any audio. 19 Q. Or my client; right? You've never heard -- 20 you've never heard Veronique De La Rosa speak, I would 21 take it? 22 A. No, I've never heard her speak. 23 Q. Okay. Now, Mr. Jones' position about what 24 that interview was for -- 25 A. Uh-huh.</p>	<p style="text-align: right;">197</p> <p>1 De La Rosa, that's pretty much limited to the InfoWars 2 videos? Do you have written documents you reviewed 3 about Veronique? 4 A. I don't recall. Like I said, I've reviewed a 5 lot of documents, so -- 6 Q. Okay. 7 A. -- I don't recall. 8 Q. Based on what the company knows, based on its 9 knowledge of the plaintiffs, does the company have any 10 reason to contend that any of these parents have been 11 faking their level of distress over InfoWars' actions 12 as it regards Sandy Hook? 13 A. No. I think there is a distinction between 14 distress related to the shooting and distress related 15 to the coverage, which should be litigated. But also, 16 I think there's a distinction -- should -- probably 17 should be made between InfoWars airing other people's 18 coverages and then the original source of the coverage. 19 Q. Are you saying that as a matter of the 20 company's personal opinion, or is this the company's 21 legal opinion, what is this? 22 A. I think it's a legal opinion as to much of 23 the sourcing. 24 MS. BLOTT: I'm going to object to the 25 extent that you're getting into any conversations</p>



<p>198</p> <p>1 you've had with any of the attorneys for Mr. Jones, 2 InfoWars, Free Speech Systems, Inc., or Mr. Shroyer. 3 MR. OGDEN: Or Kit Daniels. 4 THE WITNESS: That's tomorrow, I 5 think. 6 MS. BLOTT: Kit Daniels is not an 7 attorney. 8 MR. OGDEN: I understand that. The 9 other is Mr. Shroyer. 10 A. The original -- 11 MR. BANKSTON: That's a good point. 12 A. The original sourcing of the -- 13 MS. BLOTT: But they are defendants in 14 this lawsuit for which she's here today. 15 MR. BANKSTON: Yeah, but if she had 16 conversations with an attorney about Kit Daniels or 17 anything that related to attorney-client privilege, 18 that would be equally privileged in this case. And you 19 know that, come on now. 20 Q. (BY MR. BANKSTON) Is that -- is that 21 basically the -- 22 A. The sourcing -- the original sourcing of the 23 material, so, like, for example, Free Speech Systems' 24 position is that it is a -- it is a blogger, it is a 25 punditry, it's commentary. We're not doing independent</p>	<p>200</p> <p>1 made about grief that was caused directly by the 2 shooting itself and maybe things that were said 3 afterwards; right? 4 And that there may also need to be 5 distinctions about who said it. Maybe it was third 6 parties, maybe it was InfoWars. And I get that those 7 distinctions exist. But notwithstanding those 8 distinctions and whatever slices need to be cut out of 9 this pie, you will agree with me that these parents' 10 grieving process has been affected by what InfoWars did 11 about Sandy Hook? 12 A. By what InfoWars did, by what other people 13 who are posting on the Internet did, by, you know, any 14 other third party, any other news media coverage, yes, 15 I'm sure it has. 16 Q. Okay. 17 A. Not just InfoWars. 18 Q. Not just InfoWars? 19 A. That's correct. 20 Q. Okay. Can you tell me another major -- major 21 media organization who has covered Sandy Hook from the 22 same perspective as InfoWars wars, i.e., saying that 23 my -- my clients are fake. Do you know anybody else 24 who's done that? 25 A. Other news media organizations have covered</p>
<p>199</p> <p>1 resource -- resourcing or research and we're not really 2 engaged 99 percent of the time in journalism. 3 So the original sourcing of these materials 4 is another person, is a third party person. 5 MR. BANKSTON: We'll talk about that 6 later. 7 A. So I guess the question is to what extent 8 those people are responsible for their -- their 9 opinions unassociated with -- 10 Q. (BY MR. BANKSTON) Got you. 11 A. -- free speech. 12 Q. So if Wolfgang Halbig's on air, it's the 13 company's position that maybe it doesn't have any 14 responsibility for what Wolfgang Halbig says? 15 A. That's correct. 16 Q. We'll see how that goes. Based on what the 17 company knows, does the company have any reason to 18 dispute that these parents' grieving process of its -- 19 of their children has been impacted by InfoWars' 20 actions as it regards Sandy Hook? 21 A. I think it's subject to the same answer from 22 my last question. 23 Q. But, I mean, in other words, that's why I'm 24 trying to kind of follow up on here. Is I understand 25 you think there may be distinctions that need to be</p>	<p>201</p> <p>1 it. I don't know necessarily from the same 2 perspective. 3 Q. Well, I mean, you're saying that there's 4 other people who are responsible? 5 A. There are other people's opinions that have 6 been talked and discussed. I just saw an article 7 yesterday that is still claiming that Sandy Hook didn't 8 happen and this article was not amplified in any way by 9 InfoWars. So these people are still out there and you 10 can Google search it and it will still come up on a 11 Google search. 12 Q. Now, you're -- you're aware enough to -- to 13 realize that if somebody was writing about Sandy Hook 14 being faked today, there is a substantial likelihood 15 that they were influenced by InfoWars' coverage. 16 That's a possibility; right? 17 A. It's also a possibility they're doing their 18 own independent research. 19 Q. Hundred percent. 20 A. It also is a possibility they're basing their 21 opinions on Halbig's. There's also of an -- based on 22 somebody else. I don't know where their information is 23 coming from. 24 Q. Even if they based it on Halbig, there's a 25 substantial possibility they know about Halbig because</p>

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<p>202</p> <p>1 of him being brought to public consciousness through 2 InfoWars. That's a possibility; right? 3 A. I don't know how it's being brought to their 4 consciousness. 5 Q. Exactly. So what I want to -- I want to get 6 to is, can you name me everybody else's who's, like, I 7 mean, I think you -- you've -- you've -- you've 8 acknowledged that some of the impact on the grieving 9 process of my parents came from InfoWars. Can you tell 10 me everybody else who needs to be blamed? 11 A. Whoever's doing their own individual 12 reporting on the -- on the issue. So, like, for 13 example, like I said, I saw an article that was written 14 yesterday. Much of the opinions that were written -- 15 written in that article, it was, like, 150 pages long, 16 had nothing to do with anything InfoWars had ever 17 talked about. 18 Q. Really? 19 A. Right. 20 Q. Okay. 21 A. So it's -- so they're doing their own 22 independent -- I don't -- I don't want to call it 23 research, but, you know, their opinions are based on 24 things that are not connected in any way to this. 25 Q. Okay. Can you -- can you produce that for</p>	<p>204</p> <p>1 A. I don't know that we've covered it in any 2 substantive way. Like I said, Fetzer really wasn't -- 3 Q. I want to make -- I want to make that 4 distinction. 5 A. Sure. 6 Q. You don't know; right? 7 A. I've not seen any material that -- that shows 8 that. If you want to show me it -- 9 Q. For sure. 10 A. -- I'd be happy to look. 11 Q. Right. And that's what -- I -- I don't need 12 to show it to you -- 13 A. Sure. 14 Q. -- because I -- I don't want to get into 15 that. What I want to make sure I understand is that 16 you don't know if InfoWars has covered that. 17 A. I don't believe it's been covered. I've not 18 seen any information to that effect. 19 Q. Okay. And -- and I want to make sure from 20 this last question we talked about on the grieving 21 process because I know you're making a distinction that 22 other people may be responsible too. The company does 23 not dispute that it bears some responsibility for the 24 impact that it had on the grieving process of these 25 families?</p>
<p>203</p> <p>1 me? Do you have that article you saw? 2 A. I can e-mail it, I'm sure, if -- 3 Q. Okay. I just to want make sure -- 4 A. -- Attorney Blott -- 5 Q. -- it's a thing that you could find again if 6 you needed to. 7 A. Sure. 8 Q. Okay. And -- and your representation is you 9 read all 150 pages of that and none of it comes from 10 InfoWars? 11 A. I did not read all -- I scanned it. So, 12 like -- so for example, some of it was -- in there was 13 based on a lawsuit Mr. Pozner filed against Mr. Fetzer 14 in either Wisconsin or Michigan, I'm not really sure 15 which state, for defamation. I don't believe we've 16 ever covered that defamation suit in any way. 17 She also cites to some other photographs that 18 I don't think we ever covered. So these are -- those 19 are things that really are not being advised by us. 20 Q. All right. When you -- 21 A. They're getting them in other places. 22 Q. When you say InfoWars, you do not believe has 23 covered the Fetzer versus Pozner defamation suit? 24 A. The one that was -- was it Wisconsin? 25 Q. Uh-huh.</p>	<p>205</p> <p>1 A. I don't know that I would necessarily agree 2 with that. 3 Q. Okay. But we -- you did agree that InfoWars, 4 its coverage did impact that grieving process, you just 5 don't think they have any responsibility for it; right? 6 A. That's correct. 7 Q. Okay. If, over the course of years, InfoWars 8 was telling the world that Sandy Hook is fake and that 9 controversy stays alive, does the company understand 10 that it might be hard for my clients to have closure on 11 the death of their children? 12 A. I don't think that -- and I -- maybe we need 13 to talk about what fake means. So when you said fake, 14 is that -- does that mean children didn't die -- 15 Q. Yeah. Let's -- let's do those. 16 A. -- does that mean it is a fake flag, does 17 that -- what does -- what does fake mean? 18 Q. No, I -- I get what you're saying, I do. And 19 let's just go ahead and make sure we both are on the 20 same page. 21 A. Sure. 22 Q. I -- I don't think we do need to split a lot 23 of hairs about what fake is or is not. And would you 24 agree with me that the reason that we don't need to do 25 that is because many, many times, people on InfoWars</p>

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<p style="text-align: right;">206</p> <p>1 including Mr. Jones have unequivocally said that Sandy 2 Hook is completely fake, totally synthetic, 3 manufactured? Do you agree with that? 4 A. I agree those are direct quotes on Mr. Jones' 5 opinions, yes. 6 Q. Okay. So let's go back to the question. 7 Because now we can both -- we both understand and we 8 both agree that many, many times, it was said on 9 InfoWars that Sandy Hook was totally fake. And if 10 that's a true thing, if that's the reality that that 11 was said many, many times, the company can understand 12 that if that keeps the controversy alive, my clients 13 might have a hard time having closure on the death of 14 their children; right? 15 A. And here's the problem that I'm having, is I 16 think that the distinction is important because I think 17 there is a big difference between saying something is 18 synthetic in the sense that it could be a false flag, a 19 government operation, is not the same thing as saying, 20 your children did not die. 21 Q. Very -- okay. Let's make it really clear, 22 then. Let's make sure we're really on the -- because 23 we talked about, yes, they did say it was totally fake, 24 totally manufactured; right? But that may mean, 25 according to you, that kids could have died or they may</p>	<p style="text-align: right;">208</p> <p>1 think it's in -- I might want to say I can review my 2 notes. 3 Q. We'll get -- trust me, we'll get to it. 4 A. There is one video clip where he does say 5 that direct quote. But there's numerous other quotes 6 where he says, I believe kids died and I -- or -- 7 and/or I'm not sure whether kids died, but something 8 smells funny, or look at this issue, or look at that 9 issue. 10 Q. Do you -- 11 A. So I think there is one video clip where he 12 says that. But on the whole, numerous other times, 13 that is not what the coverage was. 14 Q. He said in other videos, there are pictures 15 of kids they said that died that are still alive; 16 right? 17 A. Can you point me to the video? 18 Q. I will. We'll get there. I'm just wondering 19 if you know it right now. 20 A. Off the top of my head, no. 21 Q. Okay. Let's take a break. You need lunch? 22 A. Yeah, that would be nice. 23 Q. Okay. 24 THE VIDEOGRAPHER: 12:34 off. 25 (Recess from 12:34 p.m. to 1:45 p.m.)</p>
<p style="text-align: right;">207</p> <p>1 have not died; right? 2 A. He said that numerous times. 3 Q. Right. But we both know that numerous times, 4 he said kids did not die. We know that; right? 5 A. I don't think that I agree with that 6 statement. I think numerous times, he's questioned 7 some anomalies that -- or what he viewed as anomalies. 8 Numerous times, he did say, I think kids died. Maybe 9 on one or two occasions, he's like, oh, maybe I'm not 10 sure if -- if they did or didn't die, I'm not sure. 11 I can't make a decision either way. But I 12 think that upon review of the videos, I think that 13 Mr. Jones, his opinion was that on the whole, children 14 died. 15 Q. Okay. All right. Probably -- probably what 16 we're going to need to do after the break, because I 17 didn't plan I'd be showing you videos today. But I did 18 not think that there would be any resistance to the 19 idea of Mr. Jones saying, yeah, I used to think kids 20 died. Nope, they sure didn't. I didn't think there'd 21 be resistance to that idea. So we may need to watch 22 some videos on that. 23 A. Like I said -- 24 Q. But -- 25 A. -- I think there is one video clip, and I</p>	<p style="text-align: right;">209</p> <p>1 THE VIDEOGRAPHER: 1:45 on the record. 2 Q. (BY MR. BANKSTON) One of the things we 3 talked about right before you left is that you saw an 4 article recently saying that Sandy Hook was fake. You 5 remember that? 6 A. Yes. 7 Q. Okay. And you told me that you wanted to 8 make sure it was clear that InfoWars didn't amplify 9 that article. 10 A. Yes. 11 Q. Okay. But InfoWars, by that answer, I take 12 it you understand InfoWars does amplify things said by 13 other people about Sandy Hook. 14 A. Amongst other things, but yes. 15 Q. Okay. And that's a choice InfoWars makes of 16 who to amplify and who not to amplify; correct? 17 A. Yes. 18 Q. Okay. Have you ever been in a deposition 19 before? 20 A. You mean, have I taken one, or have I given 21 one? 22 Q. Ever been in a room where a deposition was 23 happening? 24 A. Yes. 25 Q. Okay. Are those -- did you -- have you taken</p>

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<p style="text-align: right;">210</p> <p>1 criminal law depositions or been present for civil law 2 depositions? 3 A. There's no such thing as a criminal 4 deposition. But yes, I've been in civil depositions. 5 Q. We have them here in Texas, actually. 6 A. Oh, we don't have any in -- in Connecticut. 7 Not allowed to take criminal depositions. 8 Q. Okay. Have you ever been in deposition 9 representing somebody in a civil deposition? 10 A. Yes. 11 Q. Okay. So you've done some civil work, I take 12 it? 13 A. Yes. 14 Q. Okay. How long have you practiced? 15 A. This is my tenth year. 16 Q. Okay. Have you ever been a corporate 17 representative before? 18 A. No. 19 Q. I assume that you have a written agreement 20 for your work in this case. 21 A. You know what, and I don't think I ever 22 actually got a written agreement. I don't think I 23 signed an agreement. 24 Q. Okay. Do you have an invoice? 25 A. That I sent to the company?</p>	<p style="text-align: right;">212</p> <p>1 that right there? 2 (Exhibit No. 8 marked.) 3 A. Yes. 4 Q. (BY MR. BANKSTON) Okay. From what I'm able 5 to tell, this notebook contains a couple of things. 6 And one of the things it seems to contain is a chart of 7 videos that you've reviewed; right? 8 A. Yes. 9 Q. And some notes you've taken on that? 10 A. Yes. 11 Q. There also seem to be some notes you've taken 12 on interviews and depositions and various things like 13 that? 14 A. Yes. 15 Q. And then there seem to be a lot of tabbed 16 pages with Bates numbers codes on them for videos; 17 right? 18 A. Right. That's generally my expanded notes on 19 the videos. 20 Q. Okay. 21 A. So the first chart you're referencing is, 22 like, my reference chart. And then the spreadsheet 23 with the tabs that you're referencing, those are my 24 more in-depth notes -- 25 Q. Okay.</p>
<p style="text-align: right;">211</p> <p>1 Q. Uh-huh. 2 A. Yeah, I believe so. 3 Q. Okay. So in other words, the amount of money 4 you were paid was documented at some point? 5 A. Yes, through my internal documenting system. 6 I use Clio. 7 Q. Okay. Now, you understand there's a 8 protective order in this case? 9 A. Yes. 10 Q. And I haven't seen a signed protective order 11 acknowledgment from you. Have you done that? 12 A. I have not been provided one, but I'm happy 13 to do it. 14 Q. Okay. But, in other words, before being 15 exposed to my client's confidential information, you 16 didn't sign a protective order? 17 A. No, I haven't signed anything. 18 Q. Okay. 19 MR. BANKSTON: Can you give me -- 20 where's my book? Oh, no, that's the notice. 21 Q. (BY MR. BANKSTON) Okay. So the first thing 22 I want to put on the record is that you have given me 23 this notebook; right? 24 A. Yes. 25 Q. I have marked it as Exhibit 8. Do you see</p>	<p style="text-align: right;">213</p> <p>1 A. -- on the videos. 2 Q. Did you make this? 3 A. Yes. 4 Q. Okay. 5 MR. BANKSTON: Good point, man. 6 That's strange. Okay. 7 Q. (BY MR. BANKSTON) Let me just get that out 8 of the way right -- actually. Because we're going to 9 start talking about some videos. Do you see the video 10 on here that starts with professor claims? 11 A. Yes. 12 Q. Okay. And then I see you've taken some notes 13 over to the side; right? 14 A. Yes. Like I said, this is just my basic 15 bullet point clip of what that video is about. And 16 then I have more in-depth notes later on. 17 Q. Okay. And so one of the notes that you've 18 taken on that video -- first, can you tell me the date 19 on that video? 20 A. 1/10/2013. 21 Q. Okay. And then you have some notes in there 22 about Owen Shroyer? 23 A. Yeah. 24 Q. Can you tell me what that means? 25 A. It might have been Owen was either in that</p>

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<p>214</p> <p>1 video or did the interview --</p> <p>2 Q. Uh-huh.</p> <p>3 A. -- or something to that effect.</p> <p>4 Q. Or maybe was the source for the information</p> <p>5 or something, some way involved?</p> <p>6 A. No, I don't think it would have been the</p> <p>7 source. It would have been the person who was doing</p> <p>8 the video.</p> <p>9 Q. Okay.</p> <p>10 A. But I could be mistaken on it. Can I check</p> <p>11 my more in-depth notes --</p> <p>12 Q. Yeah, I mean --</p> <p>13 A. -- on that video? It's -- let's see. Yeah.</p> <p>14 So for that video, I have the reporter as Owen Shroyer.</p> <p>15 Q. Okay.</p> <p>16 A. And his source was James Tracy and his -- his</p> <p>17 website and various other sources.</p> <p>18 Q. Okay. I have -- I'm a little concerned about</p> <p>19 that answer.</p> <p>20 A. Okay.</p> <p>21 Q. Because Owen Shroyer didn't start working at</p> <p>22 InfoWars until 2016.</p> <p>23 A. Okay.</p> <p>24 Q. Did you know that?</p> <p>25 A. I did. So you know what, might -- might be a</p>	<p>216</p> <p>1 Q. Because I -- I -- I understand the situation</p> <p>2 you're in. And let me make sure I make it very clear</p> <p>3 to you as an individual that I 1,000 percent agree with</p> <p>4 you that asking one person to create all of this is</p> <p>5 pretty unreasonable. I agree with that. Okay?</p> <p>6 But what I'm asking you is, because you were</p> <p>7 just the one person who had to somehow assimilate all</p> <p>8 of this information, there's going to be mistakes in</p> <p>9 there?</p> <p>10 A. Oh, of course.</p> <p>11 Q. Okay. Now, let's talk about -- let me give</p> <p>12 you a stapled copy, or this is going to get messy. And</p> <p>13 this goes in your binder where you had it in the front.</p> <p>14 A. Thanks.</p> <p>15 Q. Okay. And then I am marking -- this will be</p> <p>16 Exhibit 9. I've handed you Exhibit 9, which is a</p> <p>17 file-stamped copy of Neil Heslin's original petition in</p> <p>18 his intentional infliction of emotional distress case.</p> <p>19 That's something you've reviewed; right?</p> <p>20 (Exhibit No. 9 marked.)</p> <p>21 A. Yes, I've seen this.</p> <p>22 Q. (BY MR. BANKSTON) Or, actually, no. Go</p> <p>23 ahead. You can hang on to that. Okay. Can you go to</p> <p>24 paragraph 61 for me.</p> <p>25 A. Okay.</p>
<p>215</p> <p>1 typo on my part.</p> <p>2 Q. Okay.</p> <p>3 A. I reviewed that video pretty early on, so I</p> <p>4 might have gotten his -- him mixed up with somebody</p> <p>5 else. But you see where I have its reporter?</p> <p>6 Q. Uh-huh.</p> <p>7 A. And that's where I would have put the name of</p> <p>8 whoever was hosting that particular video. So it -- it</p> <p>9 probably is just a typo on my part.</p> <p>10 Q. Or a mistake.</p> <p>11 A. Yeah.</p> <p>12 Q. It's not accurate, in other words.</p> <p>13 A. No, you're right. It's not accurate.</p> <p>14 Q. Okay. So just from off the bat, we can say</p> <p>15 we know at least some of the information in this chart</p> <p>16 is not accurate.</p> <p>17 A. Well, I made this chart. It's a hundred</p> <p>18 pages long in the last two weeks. So --</p> <p>19 Q. Yeah. I mean, I -- look. I agree with you.</p> <p>20 A. So I did my best and there might be some</p> <p>21 typos in there and there might be some -- some errors,</p> <p>22 yes. There might be.</p> <p>23 Q. Let me just make sure we're clear going</p> <p>24 forward in the deposition.</p> <p>25 A. Sure.</p>	<p>217</p> <p>1 Q. So what we're going to do is work backwards</p> <p>2 in time from -- from recent videos to older videos.</p> <p>3 Okay? And part of the reason we're going to do that is</p> <p>4 because there's going to be some things that we talk</p> <p>5 about in these recent videos that are also talked about</p> <p>6 in the old videos.</p> <p>7 But in other words, once we cover a topic, we</p> <p>8 won't have to repeat it for the later videos. Okay?</p> <p>9 So that's why I'm doing it in that direction is I'm</p> <p>10 going backwards.</p> <p>11 A. Okay.</p> <p>12 Q. So, for instance, there may be things I ask</p> <p>13 you about in this video that are also talked about in</p> <p>14 this video. But hopefully if we can get the source</p> <p>15 first here, we won't have to repeat them again. You</p> <p>16 understand what I'm saying?</p> <p>17 A. Uh-huh.</p> <p>18 Q. Because I think you'll agree with me that</p> <p>19 some of the factual assertions made about Sandy Hook</p> <p>20 have been made repeatedly in several videos; right?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. So let's talk about this. And you see</p> <p>23 there in paragraph 61, it talks about an October 26,</p> <p>24 2017 video that was entitled, JFK Assassination</p> <p>25 Documents to Drop Tonight. Do you see where it says</p>

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<p>218</p> <p>1 that?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Have you watched that video?</p> <p>4 A. If I may check my notes.</p> <p>5 Q. Uh-huh.</p> <p>6 A. No. It's not on the list of videos that I</p> <p>7 reviewed.</p> <p>8 Q. Okay.</p> <p>9 A. Probably because the main -- the main source</p> <p>10 -- not source, but the main topic of this particular</p> <p>11 video is JFK and the documents that were released in --</p> <p>12 in a declassification by the government, I believe.</p> <p>13 Q. How do you know that? How do you know that</p> <p>14 that's the main --</p> <p>15 A. Just by the title.</p> <p>16 Q. Okay. So you know that's the title. But you</p> <p>17 don't know that's the main topic of the video? You</p> <p>18 don't know that; right?</p> <p>19 A. I know they did covering of these particular</p> <p>20 documents, the JFK documents.</p> <p>21 Q. How do you know that?</p> <p>22 A. Just by being familiar with some of the</p> <p>23 things that the company has talked about in the past.</p> <p>24 Q. From interviews, you mean?</p> <p>25 A. From interviews, from looking at the website,</p>	<p>220</p> <p>1 A. Sure. I mean, and there's a lot of reasons</p> <p>2 for that. Generally, you know, Alex comes on the air</p> <p>3 and I don't think he even really knows what he wants to</p> <p>4 talk about. He'll have a general idea of what he wants</p> <p>5 to talk about, and then he'll go into a tangent on</p> <p>6 something else. And then maybe for one or two minutes,</p> <p>7 talk about a completely unrelated topic and then switch</p> <p>8 back to the general topic.</p> <p>9 So when I say that the general topic of this</p> <p>10 particular video is JFK Assassination Documents to Drop</p> <p>11 Tonight, that's the general topic. And he may have</p> <p>12 talked about other things unrelated to that topic in</p> <p>13 the video as a tangent and then recircled back. But as</p> <p>14 I said, the general topic.</p> <p>15 Q. Okay. So is the reason you didn't watch this</p> <p>16 video is because it had a different general topic and</p> <p>17 you didn't think it was really about what we were</p> <p>18 talking about today?</p> <p>19 A. I did not see that particular video on the</p> <p>20 Dropbox. I reviewed all the videos that were on the</p> <p>21 Dropbox.</p> <p>22 Q. Let's talk about this Dropbox. Is this</p> <p>23 something the company maintains?</p> <p>24 A. So I think we talked about a little bit how</p> <p>25 there's been some issues with production versus --</p>
<p>219</p> <p>1 from reviewing the materials that I've read. I just</p> <p>2 haven't watched this particular video.</p> <p>3 Q. Okay. So you've gone to the website and seen</p> <p>4 things about JFK on the website?</p> <p>5 A. Not about JFK. Just things that they've</p> <p>6 covered in the past. Like, the documents that we've</p> <p>7 reviewed that we've also -- that we've talked about</p> <p>8 that we've reviewed.</p> <p>9 Q. No, I'm trying to understand how you know the</p> <p>10 main topic of this video. Is it -- is it from</p> <p>11 anything --</p> <p>12 A. I just answered that --</p> <p>13 Q. No. Right. I know what --</p> <p>14 A. -- I've read the title of the video.</p> <p>15 Q. Okay. That's what I want to know. It's from</p> <p>16 the title -- you're assuming that the title describes</p> <p>17 -- and again, this is generally how titles work, I</p> <p>18 think you'd agree; right?</p> <p>19 A. Right.</p> <p>20 Q. That that's, like, a main idea or a main</p> <p>21 thesis?</p> <p>22 A. Yes.</p> <p>23 Q. But sometimes, things don't always follow</p> <p>24 intuitively at InfoWars. You'd -- you'd agree with</p> <p>25 that, that titles don't always necessarily reflect --</p>	<p>221</p> <p>1 here, production in Connecticut, there's a bunch of</p> <p>2 cases. So we've had a lot of trouble figuring out what</p> <p>3 has been disclosed in the various cases. And we've</p> <p>4 been trying to maintain a general, you know, one source</p> <p>5 of information.</p> <p>6 It's in the process of being reorganized. So</p> <p>7 if it wasn't on the Dropbox, I couldn't find it.</p> <p>8 Q. Okay. Do you know if the company has this</p> <p>9 video?</p> <p>10 A. That, I don't know either because I know that</p> <p>11 some of the videos that are alleged in this petition</p> <p>12 were produced by the plaintiffs and -- because we</p> <p>13 didn't have them. So I don't know if we have this</p> <p>14 video.</p> <p>15 Q. What did you do to try to find out?</p> <p>16 A. About this particular video?</p> <p>17 Q. Uh-huh.</p> <p>18 A. I did not ask anybody about this particular</p> <p>19 video.</p> <p>20 Q. Okay. You read Ms. Karpova's deposition;</p> <p>21 right?</p> <p>22 A. Yes.</p> <p>23 Q. She watched this video. You know that;</p> <p>24 right?</p> <p>25 A. In preparation for the deposition?</p>

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<p style="text-align: right;">222</p> <p>1 Q. Absolutely. Well, I wouldn't necessarily 2 describe it as preparation. I would describe it as she 3 got kind of caught having not watched anything and then 4 during the break, attempted to prepare herself, but 5 yes. 6 A. I think that was my recollection too. I 7 don't think she watched the entire video. I think she 8 watched clips of the video on a break. 9 Q. I think she skimmed through it, yeah. 10 A. Right. I think that's what her testimony is. 11 Q. Because, see, I think with Ms. Karpova, her 12 being a producer, she's familiar enough with the 13 standard format of the show that she can kind of skim 14 through and know where topics start and stop. And so I 15 think she was able to skim through it. You -- you -- 16 you haven't done that? 17 A. I don't know if -- if that's the case. I 18 think that that's the point of them making those -- 19 those notes was to know where things were in 20 particular. Production, just because they were having 21 problems with that, like, what segment was -- what they 22 were talking about in what segment. That's the reason 23 why they were producing those -- those logs. So I 24 don't know if she can tell -- 25 Q. Okay.</p>	<p style="text-align: right;">224</p> <p>1 A. This house being bulldozed? 2 Q. Sure. 3 A. You mean where did Alex Jones get the belief 4 that the house was bulldozed? 5 Q. Right. 6 A. I believe that there were property records 7 that had indicated that the house was bulldozed. 8 Q. Have you seen those? 9 A. I have not seen the documents, no. 10 Q. Have you tried to locate them? 11 A. No. 12 Q. Okay. 13 A. I don't think they were amongst the documents 14 that the company has. 15 Q. All right. Do you understand the story that 16 was -- that this -- okay. So this video covers a story 17 by LeAnne McAdoo. Do you understand that story? 18 A. Sure. 19 Q. Okay. You know who LeAnne McAdoo is? 20 A. Yes. 21 Q. Okay. She's somebody whose work is featured 22 in this video. 23 A. Yes. 24 Q. Okay. Did you talk to her? 25 A. No, I didn't.</p>
<p style="text-align: right;">223</p> <p>1 A. Yeah. I don't know if she can tell just by 2 looking at a video where certain statements would 3 appear in a video unless she had reviewed the logs. 4 Q. Yeah, I agree. 5 A. Yeah. 6 Q. I definitely agree with that. So in terms of 7 whatever claims were made in this video about Sandy 8 Hook that the plaintiffs are talking about, or, 9 actually, just any claims about Sandy Hook, those 10 aren't going to be things you can talk to me about 11 today; right? 12 A. I can -- I can talk to you about -- about 13 some specific allegations. Like, for example, this 14 claim that they bulldozed the house and got rid of it. 15 That's not only -- that's not a claim that was just 16 made in that video. 17 Q. Sure. 18 A. I'm sure that it was made in other videos. 19 Q. Uh-huh. 20 A. So I've watched other videos that have 21 contained this particular claim of the house being 22 bulldozed. 23 Q. Okay. 24 A. Would you like to talk about that? 25 Q. Yeah, where does that come from?</p>	<p style="text-align: right;">225</p> <p>1 Q. You try to talk to her? 2 A. No, I didn't try to talk to her. 3 Q. Okay. Do you know what employees researched 4 or vetted the information that was being produced in 5 that video? Well, hold on. Let me -- let me make 6 sure. 7 A. Sure. 8 Q. Because that's a bad question. Because we 9 both can agree you don't really know all the 10 information that was in that video; right? 11 A. In this video, no. But, you know, like I 12 said, just from the title, it's not really clear that 13 that was the main focus of that video. 14 Q. I'm -- I'm -- I'm a hundred percent sure that 15 there was no main focus of that video. Because like 16 you say, the -- the idea of Alex Jones having a 17 cohesive main topic is sort of silly. It doesn't -- 18 that's not what he does. That's simply not the 19 protocol or format of what he does on air. 20 A. Right. 21 Q. But we know for a hundred percent sure that 22 Sandy Hook was discussed in this video. 23 A. Oh, yeah. I'm sure he discussed it and I'm 24 sure -- I'm -- I mean, I'm not disputing that these 25 statements were made in that particular video. They</p>

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<p style="text-align: right;">226</p> <p>1 were also made other places too.</p> <p>2 Q. And you would think that plaintiffs have a</p> <p>3 right to ask about that --</p> <p>4 A. Sure.</p> <p>5 Q. -- and how that happened; right? But you</p> <p>6 sitting here today don't know all the claims about</p> <p>7 Sandy Hook in that video?</p> <p>8 A. In this particular video?</p> <p>9 Q. Uh-huh.</p> <p>10 A. No. But like I said, these statements were</p> <p>11 made in other videos.</p> <p>12 Q. Not -- okay. Hold on. I want to make sure,</p> <p>13 because I know what was said in that video.</p> <p>14 A. Okay.</p> <p>15 Q. I know very well what was said in the video.</p> <p>16 A. Okay.</p> <p>17 Q. And there are many things said in that video</p> <p>18 that were never said in any other video. And so when</p> <p>19 you say that all the claims in that video were made in</p> <p>20 other videos, you can't verify that, can you?</p> <p>21 A. No, that's not accurate.</p> <p>22 Q. Okay.</p> <p>23 A. So, for example, this claim, phony as a</p> <p>24 three-dollar bill.</p> <p>25 Q. Uh-huh.</p>	<p style="text-align: right;">228</p> <p>1 Tonight, no.</p> <p>2 Q. No, you don't? Okay.</p> <p>3 A. No.</p> <p>4 Q. Well, let's move on that from video, then.</p> <p>5 Oh, wait. Actually, do you know -- do you know what</p> <p>6 employees were involved in creating that video?</p> <p>7 A. Unless it's on that list that we've</p> <p>8 previously marked. Do you want to --</p> <p>9 Q. Yeah, let's take out that list. Yeah, take</p> <p>10 out that list. Tell me if it is.</p> <p>11 A. So this is Exhibit 6.</p> <p>12 Q. Uh-huh.</p> <p>13 A. October 26, 2017. No, that's not one of the</p> <p>14 dates that's on here.</p> <p>15 Q. So in other words, you won't be able to tell</p> <p>16 me what employees were involved in creating this video?</p> <p>17 A. No. These dates go from 2013 through 2015.</p> <p>18 Q. Correct. So one of the most recent videos in</p> <p>19 plaintiffs' petition, one that was published mere</p> <p>20 months before Mr. Jones was sued, that's not part of</p> <p>21 the information you secured about what employees were</p> <p>22 involved in creating it; right?</p> <p>23 A. I don't -- like I said, I don't know if we</p> <p>24 even have this video.</p> <p>25 Q. I -- I'm not asking you about the video and</p>
<p style="text-align: right;">227</p> <p>1 A. Just looking at my notes, I see that that</p> <p>2 almost exact statement, tell us why this appears to be</p> <p>3 phonier than a three-dollar bill, was made in New</p> <p>4 Bombshell Sandy Hook Information Inbound in that 7ib</p> <p>5 video we talked about earlier.</p> <p>6 Q. Sure. No, no. And I understand there are</p> <p>7 going to be things in that video that was said before.</p> <p>8 A. That's right.</p> <p>9 Q. In fact, that's how I prefaced this entire</p> <p>10 discussion. I'm saying, you're going off of what</p> <p>11 you're reading right there in the petition; right?</p> <p>12 A. Going off of what?</p> <p>13 Q. When you say, for instance, when you just</p> <p>14 talked about the house being bulldozed.</p> <p>15 A. Yes.</p> <p>16 Q. Or fake as a three-dollar bill, you're</p> <p>17 reading that out of plaintiffs' petition.</p> <p>18 A. Well, yeah, I read --</p> <p>19 Q. Right.</p> <p>20 A. -- the statements; right?</p> <p>21 Q. Okay. You don't know what else was said</p> <p>22 about Sandy Hook other than what was in that petition?</p> <p>23 A. For this particular video?</p> <p>24 Q. Right.</p> <p>25 A. No. For JFK Assassination Documents to Drop</p>	<p style="text-align: right;">229</p> <p>1 if you were able to find the video. I'm asking you</p> <p>2 about a different topic, which is the employees</p> <p>3 involved in making that video.</p> <p>4 A. Oh, no. If it's not on that list, I don't</p> <p>5 have it.</p> <p>6 Q. Okay. Let's go to paragraph 59.</p> <p>7 A. Okay.</p> <p>8 Q. Do you see that talks about a June 26, 2017</p> <p>9 video entitled, Zero Hedge Discovers Anomaly in Alex</p> <p>10 Jones Hit Piece?</p> <p>11 A. I don't know the title of the video just by</p> <p>12 looking at paragraph -- is it 59? I'm sorry.</p> <p>13 Q. Yeah, you're right. It doesn't have the</p> <p>14 title in that paragraph. You're right.</p> <p>15 A. Okay.</p> <p>16 Q. But you -- in other words, this may help you.</p> <p>17 This is the video that Mr. Heslin is suing the company</p> <p>18 for defamation about involving Owen Shroyer in which</p> <p>19 Mr. Shroyer claimed that he couldn't have held his</p> <p>20 child. You understand what that video is?</p> <p>21 A. Yes.</p> <p>22 Q. Okay.</p> <p>23 A. I did watch that video.</p> <p>24 Q. Okay. You watched that video. Okay. Do you</p> <p>25 know what employees were involved in creating that</p>



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<p>230</p> <p>1 video?</p> <p>2 A. Sure. Let me just -- if I may look at my</p> <p>3 notes.</p> <p>4 Q. Uh-huh.</p> <p>5 A. Oh, I mean, I'm sorry. Are you asking me</p> <p>6 whether there were, like, for a list of employees for</p> <p>7 that video?</p> <p>8 Q. I want to know for that employee, every</p> <p>9 employee who was involved and what their role was.</p> <p>10 A. I don't know what the answer to that question</p> <p>11 is. All I can know as far as the sourcing, I think we</p> <p>12 already talked about the sourcing material. But if</p> <p>13 you're asking me --</p> <p>14 Q. Yeah, that's --</p> <p>15 A. -- every single person that worked on that</p> <p>16 particular day, if it's not on this list of Exhibit 6,</p> <p>17 I don't know. So that date is not on these lists.</p> <p>18 Q. Okay. So when you had this video to get</p> <p>19 prepared for it --</p> <p>20 A. Yeah.</p> <p>21 Q. -- and you knew you'd have to be prepared on</p> <p>22 the employees who were involved in it, what did you do</p> <p>23 to make sure you were prepared?</p> <p>24 A. To talk about that video? I'm prepared to</p> <p>25 talk about the sourcing of the video, which I think we</p>	<p>232</p> <p>1 the one that does the sourcing.</p> <p>2 Q. Okay.</p> <p>3 A. So that's just based on my conversations with</p> <p>4 how they do things. But from my understanding,</p> <p>5 production doesn't have any involvement in the content.</p> <p>6 Q. Okay. So I would take it if you were going</p> <p>7 to try to figure out what went on in this video, a</p> <p>8 person you might want to talk to is Owen Shroyer?</p> <p>9 A. I -- I read his deposition, yes.</p> <p>10 Q. Did you interview him?</p> <p>11 A. I didn't talk to him. I don't -- I don't</p> <p>12 know that he was available. I can't remember.</p> <p>13 Q. Okay. But you did read his deposition?</p> <p>14 A. I did.</p> <p>15 Q. All right. The reason I'm troubled is</p> <p>16 because he just -- he testified to the exact opposite</p> <p>17 of what you said.</p> <p>18 A. That what?</p> <p>19 Q. He said -- he said that he'd had nothing to</p> <p>20 do with picking the story or sourcing it or anything,</p> <p>21 that somebody on production staff, one of the producers</p> <p>22 of the production staff, got that material, researched</p> <p>23 and sourced it, and gave it to him and he just read it</p> <p>24 on the air. Do you think he's wrong?</p> <p>25 A. I don't think that that's -- I don't think</p>
<p>231</p> <p>1 already talked about. And when we spoke to Melinda, we</p> <p>2 tried to have her pull as much as possible the</p> <p>3 information for the people that was working -- were</p> <p>4 working that day, which was not an easy task for her.</p> <p>5 So -- and she put together that document</p> <p>6 because she was the one that was reviewing the records.</p> <p>7 Q. Okay.</p> <p>8 A. But as far as other people that were working</p> <p>9 on that video, I mean, the content of the video. If --</p> <p>10 if you're asking, you know, the sourcing for the video</p> <p>11 and --</p> <p>12 Q. No.</p> <p>13 A. All the other stuff like who was the producer</p> <p>14 for that, they wouldn't have had any involvement</p> <p>15 regarding the content of what's on that video. So,</p> <p>16 like, the production manager that was -- that was doing</p> <p>17 the video or doing the sound or whatnot, they're not --</p> <p>18 they don't have -- they don't have any involvement in</p> <p>19 that.</p> <p>20 So when I talk to production and people</p> <p>21 involved in the production, my understanding from</p> <p>22 talking to them was that the host sources their</p> <p>23 content. They pick what they want to talk about and</p> <p>24 then the producers get them the information that they</p> <p>25 request as far as video clips. And then the host is</p>	<p>233</p> <p>1 that's what the context of his testimony was. The</p> <p>2 context, I believe, of his testimony is that every day,</p> <p>3 and this is not just for Owen, but for any host, is</p> <p>4 that the associate producers put together a printoff of</p> <p>5 whatever sources that that host likes.</p> <p>6 So, for example, Alex has a list of sources</p> <p>7 that he gets printed out on a daily basis. Owen has a</p> <p>8 list of sources that he uses. The assistant -- the</p> <p>9 producer is the one that provides all this material and</p> <p>10 says, here, this -- this is the material that's off the</p> <p>11 list that you get -- that is your list.</p> <p>12 And then the host reviews that material and</p> <p>13 decides what he wants to talk about.</p> <p>14 Q. All right. We'll leave that right there.</p> <p>15 All right. And in terms of who those associate</p> <p>16 producers were --</p> <p>17 A. On that particular day, no.</p> <p>18 Q. -- in that room, you don't know? You don't</p> <p>19 know?</p> <p>20 A. But again, that would -- it would just be</p> <p>21 pulling the information off of the -- off of the</p> <p>22 Internet based on their list.</p> <p>23 Q. What does that -- what do you mean, a list?</p> <p>24 What does that mean?</p> <p>25 A. So like I said earlier, each of the hosts has</p>

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<p style="text-align: right;">234</p> <p>1 a list of sources that they pull from. So Zero Hedge 2 is a source that is on that list that they pull from. 3 And so they'll print off the articles for them off of 4 that list. 5 Q. So what I'm -- I'm trying -- I think I hear 6 is that it's, like, just every day Owen wants 7 everything that was on Zero Hedge printed and brought 8 to him? 9 A. Right. 10 Q. Okay. 11 A. All the articles that were on for that day. 12 Q. Okay. 13 A. And then he'll filter through that and 14 decide. 15 Q. Okay. Do you know what was done to research 16 or vet this information before it was put on the air? 17 A. To vet the information that was in the Zero 18 Hedge article? 19 Q. And everything that Owen said too. 20 A. Can you be more specific about what he said? 21 Because -- so -- and those are two different -- 22 Q. Absolutely not. No. 23 A. Okay. Well, those are two separate 24 questions. So the information in the Zero Hedge 25 article would have been vetted by Zero Hedge or</p>	<p style="text-align: right;">236</p> <p>1 Q. Have you talked to Zero Point Now? 2 A. No. 3 Q. Okay. When you say that Zero Hedge vetted 4 that, I take that to mean InfoWars did nothing to vet 5 that before it was put on the air at InfoWars. 6 A. InfoWars used that article as a source and 7 quoted to that source. 8 Q. That -- I -- I think you know that's not what 9 I'm asking. 10 A. It is what you're asking. 11 Q. I -- I know that -- I understand they quoted 12 it as a source. I understand it was on the video. I'm 13 trying to understand that one of two things happened. 14 One is that Owen Shroyer or whoever got it, was handed 15 a video or handed this document and gone, all right. 16 Let's put this on the air. And nothing was done 17 internally in InfoWars to verify the factual accuracy 18 of the things being said in that article. 19 Or two, there were steps taken by InfoWars to 20 make sure that the things said in that article were 21 true before they got put on the air. 22 A. No. InfoWars -- 23 Q. Which of those is true? 24 A. The company relies on the reporting done by 25 other -- other news sources to vet their information.</p>
<p style="text-align: right;">235</p> <p>1 whomever produced the article. And as far as sourcing 2 for the video that was used in that article, the source 3 was the video that was on Zero Hedge. 4 Q. Okay. So let's first -- okay. Let's first 5 start with the things that were in the Zero Hedge 6 article were vetted by Zero Hedge; is that right? 7 A. Or whoever produced that article. 8 Q. Okay. And do you know who that is? 9 A. I think it was -- I think originally -- I 10 think we talked about this. It came from iBankCoin 11 originally and then it was picked up by Zero Hedge. So 12 whoever produced it would have been iBankCoin 13 originally. 14 Q. Actually, just to help you out, Zero Point 15 Now writes for both -- he -- he reposts his articles. 16 A. Okay. 17 Q. Like, they're just posted in both places. 18 A. Okay. 19 Q. It's not like there's a -- a guy at a -- a 20 thing called iBankCoin and then Zero Hedge was, like, 21 wow, we saw that, we picked it up. I just want you to 22 know for your benefit Zero Point Now is the author of 23 that article. And he's the author of it at iBankCoin 24 too. 25 A. Okay.</p>	<p style="text-align: right;">237</p> <p>1 Q. Is Zero Point Now a news source? 2 A. It's a source for their information. So it's 3 on the list of sources that they use to get information 4 from. 5 Q. Is it a news source? 6 A. I don't know if you'd call it news, but I'd 7 say source. 8 Q. I'm bringing up that word because you said 9 news source. So I'm trying to figure out -- 10 A. It's a source -- it's on their list of 11 sources that they pull from on a daily basis. 12 Q. Okay. So these -- 13 A. It's my understanding that Zero Hedge is, 14 like, an accumulator of other various sites. So it's, 15 like, they have other -- they're citing to a variety of 16 other places and that's why they're using it as an 17 accumulator of sorts. 18 Q. Okay. Just because we may talk about Zero 19 Hedge -- 20 A. Sure. 21 Q. -- more, Zero Hedge is not like Reddit or an 22 aggregator or a news site -- 23 MR. OGDEN: Drudge. 24 Q. (BY MR. BANKSTON) Drudge or something like 25 that. You know who Tyler Durden is?</p>

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<p>238</p> <p>1 A. No.</p> <p>2 Q. All right. You may know --</p> <p>3 A. Oh, but I know Drudge is an accumulator.</p> <p>4 Q. All right.</p> <p>5 A. Yes.</p> <p>6 Q. So, like, you may know Tyler Durden. He's</p> <p>7 the main character in Fight Club that Brad Pitt played.</p> <p>8 A. Oh, yeah.</p> <p>9 Q. But that's -- that's the name of the person</p> <p>10 who runs Zero Hedge.</p> <p>11 A. Okay.</p> <p>12 Q. Or at least what they call themselves.</p> <p>13 A. Okay.</p> <p>14 Q. And that person writes articles for Zero</p> <p>15 Hedge. And then there's other contributors like Zero</p> <p>16 Point Now and they write for Zero Hedge; right?</p> <p>17 A. Okay.</p> <p>18 Q. So what I want to make sure that you</p> <p>19 understand is that this wasn't something that Zero</p> <p>20 Hedge aggregated from. This was something Zero Hedge</p> <p>21 wrote. You understand that?</p> <p>22 A. Okay.</p> <p>23 Q. Okay. So as far as the person -- the source</p> <p>24 that was quoted here, InfoWars, for this deposition,</p> <p>25 did nothing to try to talk to them or get any</p>	<p>240</p> <p>1 Q. Uh-huh.</p> <p>2 A. But the source of the video was the Zero</p> <p>3 Hedge article. They did not -- because I asked, you</p> <p>4 know, I interviewed and asked video people is, like,</p> <p>5 all right. Well, did you guys cut this video? Because</p> <p>6 at some point, they have the whole video of Wayne</p> <p>7 Carver.</p> <p>8 But they didn't use the whole video and then</p> <p>9 cut it. The video that they got was from that article.</p> <p>10 It was already precut. They didn't do anything to cut</p> <p>11 that video.</p> <p>12 Q. Who told you that?</p> <p>13 A. I believe that information came from -- it</p> <p>14 was either Daria or -- it wasn't Owen because I didn't</p> <p>15 talk to Owen. Oh, no. You know who it was, I -- when</p> <p>16 I spoke to Rob Dew, Rob Dew told me that that's where</p> <p>17 it came from.</p> <p>18 Q. Rob Dew wasn't involved in making this video;</p> <p>19 right?</p> <p>20 A. I don't think he was. But at the time, I</p> <p>21 want to say he was the -- he was a -- not supervisor.</p> <p>22 But you know they don't have titles there. But he was</p> <p>23 overseeing Owen.</p> <p>24 Q. I don't -- Rob Dew definitely has been -- had</p> <p>25 titles.</p>
<p>239</p> <p>1 information from them?</p> <p>2 A. To talk to someone at Zero Hedge?</p> <p>3 Q. Uh-huh.</p> <p>4 A. No, I did not.</p> <p>5 Q. Okay. By the same token, any of the videos</p> <p>6 that were used by Mr. Shroyer in that broadcast that</p> <p>7 came from Zero Hedge or are alleged to have come from</p> <p>8 Zero Hedge, you've done nothing to track down those</p> <p>9 videos?</p> <p>10 A. The one that was on the Zero Hedge article</p> <p>11 and then was subsequently reaired on InfoWars?</p> <p>12 Q. See, I can't make that representation because</p> <p>13 the Zero Hedge article, none of those videos actually</p> <p>14 work in them. They were all removed a long time ago.</p> <p>15 A. Okay.</p> <p>16 Q. All right? So when you say that those --</p> <p>17 those videos in -- in -- in Mr. Shroyer's video came</p> <p>18 from Zero Hedge, I'd like very much to verify that.</p> <p>19 I'd like to know where they came from.</p> <p>20 A. Right. So -- and I -- and I think I do have</p> <p>21 an answer for that just based on my conversations with</p> <p>22 -- with various people in -- in the company over the</p> <p>23 last week. Which is -- and I don't know that Owen</p> <p>24 really knew it either in his deposition because I</p> <p>25 believe you asked him that question and he wasn't sure.</p>	<p>241</p> <p>1 A. I think he gave himself a title, but nobody</p> <p>2 there really has an official title.</p> <p>3 Q. Okay. And so Rob Dew, does he know firsthand</p> <p>4 that those videos were taken unedited from the Zero</p> <p>5 Hedge site, or is that his guess based on how he thinks</p> <p>6 things work inside the company?</p> <p>7 A. No. When I asked Rob, Rob was sure that</p> <p>8 that's where it was from.</p> <p>9 Q. I mean, I'm not understanding how he would</p> <p>10 know what went on in that room that day.</p> <p>11 A. I don't know either. I'm not -- I wasn't</p> <p>12 there.</p> <p>13 Q. Okay.</p> <p>14 A. But I did ask Rob and that was his answer.</p> <p>15 Q. Okay. Can you tell me -- okay. So these</p> <p>16 list of sources that are -- InfoWars chooses to</p> <p>17 amplify; right?</p> <p>18 A. Well, chooses to source from. But yeah.</p> <p>19 Q. What's your problem with the word amplify?</p> <p>20 Isn't that the word you used earlier?</p> <p>21 A. So my problem is, is that even if a article</p> <p>22 is being sourced from these places, they're not</p> <p>23 amplifying every single article that is being sourced</p> <p>24 from these places. They're being printed and presented</p> <p>25 to the host.</p>

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<p style="text-align: right;">242</p> <p>1 Q. Got you.</p> <p>2 A. And then the host is choosing from amongst</p> <p>3 those.</p> <p>4 Q. Okay. So instead of me saying that -- the</p> <p>5 sources that are amplified, when I say that there's a</p> <p>6 list of sources who's -- some of the articles from</p> <p>7 those sources are amplified --</p> <p>8 A. Yes.</p> <p>9 Q. -- right? Who makes the decision -- who made</p> <p>10 the decision here that Zero Point -- Zero Point Now or</p> <p>11 Zero Hedge was a reliable place to be getting</p> <p>12 information from?</p> <p>13 A. So you mean in general, is there some company</p> <p>14 rule as to which sources are reliable and which sources</p> <p>15 are not reliable?</p> <p>16 Q. Not really a rule, but just anything that's</p> <p>17 ever done.</p> <p>18 A. So these are -- these are sources that are</p> <p>19 generally trusted by the hosts. These lists, so to</p> <p>20 speak, of -- of sources change over time. So, like,</p> <p>21 for example, when I spoke to Nico, Nico's position to</p> <p>22 me was Alex's source list was shorter than it is now.</p> <p>23 When I talked to Daria, he has a -- he has a list of</p> <p>24 sources, like, seven or eight long.</p> <p>25 But -- so it evolves over time. And</p>	<p style="text-align: right;">244</p> <p>1 Q. Didn't -- didn't try to speak to Mr. Fetzer?</p> <p>2 A. No, I did not.</p> <p>3 Q. Okay. And Owen had made some sort of</p> <p>4 judgment, you would agree with me, that it was</p> <p>5 appropriate to rely on Mr. Fetzer's conclusions about</p> <p>6 this; right?</p> <p>7 A. Which conclusion are you talking about?</p> <p>8 Q. The conclusions made by Fetzer in the June</p> <p>9 26, 2017 --</p> <p>10 A. Can you please specify the conclusion you're</p> <p>11 talking about?</p> <p>12 Q. Yeah, I mean, I can go ahead and pull</p> <p>13 everything Fetzer said, but you -- you'll understand</p> <p>14 that -- the point of that video; right?</p> <p>15 A. I -- I understand the point --</p> <p>16 Q. The central --</p> <p>17 A. -- of the video is that there is a claim that</p> <p>18 was made by Mr. Heslin in the Megyn Kelly interview</p> <p>19 that he held his son and had a bullet hole in his head.</p> <p>20 Q. Uh-huh.</p> <p>21 A. And then there was a cut to the clip of</p> <p>22 Mr. Carver's interview, which wasn't a whole contextual</p> <p>23 comment by Ms. -- by Dr. Carver.</p> <p>24 Q. Uh-huh.</p> <p>25 A. And then the comment that was made was these</p>
<p style="text-align: right;">243</p> <p>1 ultimately, it -- it -- the information that is</p> <p>2 preferred comes from the host. So the host would</p> <p>3 choose which sources they like to get information from.</p> <p>4 Like, other hosts, such as -- such as Mr. Knight,</p> <p>5 according to Daria, he didn't have a list that they</p> <p>6 produced for him on a daily basis.</p> <p>7 He would just -- he would himself read the</p> <p>8 news -- read -- read the Internet and send to her</p> <p>9 already, I want you to print this and be prepared to</p> <p>10 talk about this on my show. So ultimately, the list is</p> <p>11 made by the host.</p> <p>12 Q. Okay. So -- so the kind of short version for</p> <p>13 this particular video --</p> <p>14 A. Uh-huh.</p> <p>15 Q. -- for this particular video, who decided</p> <p>16 that it would be reliable, answer to that is Owen</p> <p>17 Shroyer?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Jim Fetzer's quoted in this video?</p> <p>20 A. Yes. To the extent, I believe, that it's</p> <p>21 quoted in -- in the -- in the original article.</p> <p>22 Q. Okay. And we -- I think we've already</p> <p>23 covered this, but you didn't speak to Mr. Fetzer;</p> <p>24 right?</p> <p>25 A. No.</p>	<p style="text-align: right;">245</p> <p>1 two things are inconsistent, which is it, essentially.</p> <p>2 Is that -- and that is what you're representing is the</p> <p>3 comment attributed to Mr. Fetzer? I want to make sure</p> <p>4 that --</p> <p>5 Q. Yeah, and I think you've mostly got it. I</p> <p>6 think where you were -- the little bit left is the</p> <p>7 conclusion of -- of where you reach from those is that</p> <p>8 Mr. Heslin's version of events cannot be accurate.</p> <p>9 A. I -- I disagree that that's what the purpose</p> <p>10 or conclusion that was conveyed by Mr. Shroyer.</p> <p>11 Q. I'm not -- that's not what I'm saying. I'm</p> <p>12 saying by Mr. Fetzer.</p> <p>13 A. Oh, okay. Well, if that's what Mr. Fetzer</p> <p>14 was concluding, that's not what Owen Shroyer concluded</p> <p>15 in his -- in his video.</p> <p>16 Q. Okay. He -- Mr. Shroyer -- let's go ahead</p> <p>17 and get to Mr. Shroyer. He literally said in his video</p> <p>18 that Mr. Heslin said he held his kid.</p> <p>19 A. Yes.</p> <p>20 Q. Now, according to fact-checkers, that is not</p> <p>21 possible; right?</p> <p>22 A. According to this video by Dr. Carver, who</p> <p>23 says X, these two things cannot both be true. Can we</p> <p>24 get a clarification. I don't think we're going to get</p> <p>25 a clarification. But can we get a clarification either</p>

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<p style="text-align: right;">246</p> <p>1 from Mr. Heslin or Megyn Kelly. And then he said I 2 doubt -- I doubt that's going to happen or something to 3 that effect. 4 Q. I think that's a fairly good paraphrase. 5 A. Right. 6 Q. I think you did a good job there. In other 7 words, at some point when coming to his decisions about 8 what he was going to put on the air, Mr. Shroyer had to 9 decide that Mr. Fetzer was an okay thing to be sharing 10 with the InfoWars audience; right? 11 A. I think he made a decision that the -- that 12 the report on Zero Hedge was an okay thing to be 13 sharing with the -- with the audience. 14 Q. Right. And that contains Jim Fetzer's 15 conclusions; right? 16 A. It contained information in there and 17 quotations from another person, yes. 18 Q. Yes. So by logical extension, by the way the 19 rules of logic works, if Mr. Shroyer decided that that 20 Zero Hedge article was appropriate to -- to share, 21 which communicates directly information from 22 Mr. Fetzer, then he also decided that it was 23 appropriate to share with his audience the information 24 that Mr. Fetzer was communicating; right? 25 A. I'm -- is this a question that you're --</p>	<p style="text-align: right;">248</p> <p>1 amplified Mr. Fetzer's information. 2 Q. Really? You've seen -- certainly, you've 3 seen discussions about Mr. Fetzer; right? 4 A. I have seen discussions about Mr. Fetzer. 5 Q. And about how InfoWars was relying on them? 6 A. I don't think he was being relied on to a 7 very -- to a very high degree. I don't think that that 8 was a big source of their information. And the reason 9 why I say this is because first, when I talked to 10 Mr. Watson, Mr. Watson made clear that there was no 11 good relationship at the time between Alex Jones and 12 Mr. Fetzer. They did not like one another. 13 Q. Right. 14 A. Second is, you know, in my conversations with 15 Alex, he had never even read Fetzer's material. I 16 don't even think he knows what's in there. 17 Q. I agree. 18 A. So I don't know -- I don't think that it's 19 accurate to say that Mr. Jones relied on Fetzer in any 20 real meaningful way. 21 Q. Okay. This is where I may be getting caught 22 up is the real meaningful way. Because to me, I can 23 understand what you're saying if you're saying, I don't 24 think they relied on him a bunch. But you would agree 25 with me that there are multiple videos we're going to</p>
<p style="text-align: right;">247</p> <p>1 you're asking me whether he made a determination as to 2 the credibility of Mr. Fetzer? Is that what you're 3 asking? 4 Q. I -- I think I asked appropriate. 5 A. Yeah, but -- but you're not making him make a 6 credibility determination. When you say appropriate, 7 what do you mean by appropriate? 8 Q. I -- okay. So when -- how does InfoWars 9 decide what's appropriate to share in terms of sources? 10 A. Is it -- are you asking what is reliable as a 11 -- as a -- as a source? 12 Q. If -- if that's one of the things that 13 InfoWars cares about in determining whether a source is 14 appropriate, then yeah, I would expect that to be in 15 the answer. 16 A. So I think that that just has to do with the 17 relationship with, you know, the prior history of the 18 particular source. So if that particular source has 19 been credible in the past, for example, Zero Hedge, 20 they've reported on Zero -- they have rereported, I 21 should speak, on Zero Hedge articles in the past. 22 Those have seemed to be reliable, so they would 23 continue to rely on it on the -- in the future. 24 Q. Same thing for Mr. Fetzer? 25 A. I don't know that they've ever really</p>	<p style="text-align: right;">249</p> <p>1 be talking about today where the assertion of fact 2 comes directly from Mr. Fetzer? 3 A. Mr. Fetzer was never a guest on the show 4 talking about this particular issue. But I do see in 5 some of the videos that he is quoted as a source 6 amongst other sources. 7 Q. See, this is where I'm really drawing a 8 problem is because there has been criticism inside the 9 company for relying on Mr. Fetzer as a source; right? 10 For Sandy Hook, I'm talking about. 11 A. Well, and -- and you're referring 12 specifically to an e-mail that Mr. Watson has -- has 13 promulgated. And I know which e-mail you're talking 14 about. I specifically asked about that e-mail and his 15 position is, is that he understands Mr. Fetzer wasn't 16 being relied on to a really -- to any real degree. 17 He knows Fetzer was not being relied on that 18 heavily. There were other people that were listed in 19 that e-mail aside from Fetzer. 20 Q. Jeff Rense; right? 21 A. Right. 22 Q. They actually probably didn't rely on Jeff 23 Rense much at all, did they? 24 A. I don't even see that man referred to much in 25 the material.</p>

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<p>250</p> <p>1 Q. Yeah. It's more Fetzer, really.</p> <p>2 A. Well, I mean, like I said, I don't even see</p> <p>3 Fetzer referred to much in the material. I understand</p> <p>4 that Mr. Watson made that -- did that e-mail. But as</p> <p>5 far as the video goes, he's --</p> <p>6 Q. Do you --</p> <p>7 A. -- he's not on a lot of the videos.</p> <p>8 Q. Do you think that's the only criticism of</p> <p>9 Mr. Fetzer inside the company is that e-mail that you</p> <p>10 saw?</p> <p>11 A. That's the only e-mail that I can recall at</p> <p>12 this point.</p> <p>13 Q. And certainly when reviewing the production,</p> <p>14 you saw the volume of e-mails from Jim Fetzer?</p> <p>15 A. I know Jim Fetzer sent a volume of e-mails.</p> <p>16 I can't speak to whether they were read by the company</p> <p>17 for the same e-mail -- for the same reason as</p> <p>18 Mr. Halbig.</p> <p>19 Q. Right. Because after a guy sends you maybe</p> <p>20 your sixth, 8,000th, 12,000th e-mail, you start just</p> <p>21 ignoring it; right?</p> <p>22 A. Maybe even before that.</p> <p>23 Q. Maybe before that. Maybe even before that.</p> <p>24 A. That's why I'm saying I understand that he</p> <p>25 sends e-mails. But I don't know that anybody really</p>	<p>252</p> <p>1 saw is what he does is he copies very many people in</p> <p>2 his e-mails.</p> <p>3 Q. I think you're thinking of Mr. Halbig,</p> <p>4 actually.</p> <p>5 A. He -- I think he had a bunch of e-mails</p> <p>6 copied to random people as well.</p> <p>7 Q. Did he? Okay.</p> <p>8 A. But, I mean, I could be wrong. But in any</p> <p>9 event, like I said, unless -- if it's to either a</p> <p>10 general mailbox like info@ or writers@infowars. But</p> <p>11 even specific e-mails, like to Nico, they're not --</p> <p>12 they weren't responding or monitoring his e-mails.</p> <p>13 Q. I -- see, and I think what you just testified</p> <p>14 is you don't know if they read the e-mails. And now</p> <p>15 you're saying they didn't.</p> <p>16 A. I don't know if they read them. I don't know</p> <p>17 if they read them. But what I'm saying to you is when</p> <p>18 I spoke to Nico, his position is, I didn't even bother</p> <p>19 responding or even reading these e-mails because I knew</p> <p>20 he wasn't going to be on the show. It wasn't relevant</p> <p>21 to me because unless I need to book them to be on the</p> <p>22 show --</p> <p>23 Q. Uh-huh.</p> <p>24 A. -- I don't pay attention to these e-mails.</p> <p>25 So -- and I think we already know that Mr. Jones</p>
<p>251</p> <p>1 read it and/or responded to it or anything like that.</p> <p>2 Q. So -- so -- well, first of all, did you ask</p> <p>3 anybody if they had ever looked at Mr. Fetzer's</p> <p>4 e-mails?</p> <p>5 A. So I talked to Mr. Jones about Mr. Fetzer and</p> <p>6 Mr. Jones' position is he didn't really -- he didn't</p> <p>7 rely on Mr. Fetzer.</p> <p>8 Q. All right. Let's see here. You would agree</p> <p>9 with me that by June 26, 2017, the company had -- I</p> <p>10 mean, in other words, before this video, prior to this</p> <p>11 video on June 26, 2017 that discusses information from</p> <p>12 Mr. Hetzer -- Mr. Fetzer, the company had in its</p> <p>13 possession an extremely large volume of e-mails from</p> <p>14 Mr. Fetzer which clearly reveal to any rational person</p> <p>15 that Mr. Fetzer is not mentally balanced; correct?</p> <p>16 A. Are you asking whether they're in our</p> <p>17 possession --</p> <p>18 Q. Yes.</p> <p>19 A. -- or whether we -- yes, they're in our</p> <p>20 possession. They're on our e-mail server.</p> <p>21 Q. And you never read them?</p> <p>22 A. I can't answer as to whether they were ever</p> <p>23 read unless there is something forwarding it from</p> <p>24 somebody else or there was a response to it in any way.</p> <p>25 But generally, if -- what he does is, is -- and what I</p>	<p>253</p> <p>1 doesn't pay attention to the e-mails. So it -- in all</p> <p>2 likelihood, nobody was reading those e-mails.</p> <p>3 Q. And before his information was used on June</p> <p>4 26, 2017, nobody read those e-mails to your knowledge?</p> <p>5 A. Not to my knowledge.</p> <p>6 Q. Okay. But if somebody had, if somebody had</p> <p>7 taken the effort before putting Mr. Fetzer's stuff on</p> <p>8 the air in 2017 of reading those e-mails, they would</p> <p>9 have come to the conclusion that Mr. Fetzer is not a</p> <p>10 well man. You would agree with that?</p> <p>11 A. I mean, I think that that's kind of</p> <p>12 speculation at this point because nobody -- I don't</p> <p>13 think anybody read the e-mails.</p> <p>14 Q. Have you?</p> <p>15 A. Read those e-mails in the production?</p> <p>16 Q. Yeah, from Mr. Fetzer.</p> <p>17 A. I've read some of his e-mails.</p> <p>18 Q. Yeah, they're not good, are they?</p> <p>19 A. No, they're not.</p> <p>20 Q. They're -- they're not a man who's not -- my</p> <p>21 mom used to say not with a full deck. You know what</p> <p>22 that means?</p> <p>23 A. I do know what that means.</p> <p>24 Q. Okay.</p> <p>25 A. I don't think he has a full deck.</p>

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<p>254</p> <p>1 Q. And I don't -- I don't -- I don't want --</p> <p>2 yeah. I mean, again, I'm not trying to get InfoWars to</p> <p>3 here give psychological opinions or whatever. But if</p> <p>4 InfoWars had read those e-mails, and now you as the</p> <p>5 corporate representative who's had, they would</p> <p>6 understand that that is not a good man to be relying</p> <p>7 on; right?</p> <p>8 A. I think it was more so they were relying on</p> <p>9 the Zero Hedge reporting more so than Mr. Fetzer.</p> <p>10 Q. I'm saying if they had. If they had.</p> <p>11 A. I'm saying if they -- if they had, I don't --</p> <p>12 I can't answer that because it's speculating. But what</p> <p>13 I'm saying is, is even if someone -- just for example.</p> <p>14 I have -- I -- I'm a criminal defense attorney. You</p> <p>15 know this; right? I have people that are not operating</p> <p>16 with full decks. They have psychological issues.</p> <p>17 That doesn't mean that everything that they</p> <p>18 say is false. So it -- it -- it just doesn't. It's</p> <p>19 just -- you know.</p> <p>20 Q. Okay.</p> <p>21 A. So it's hard to pick and choose what is false</p> <p>22 and what is not false. However, I would say that the</p> <p>23 reliability of Mr. Shroyer is not on Mr. Fetzer, it's</p> <p>24 on the reporting of Zero Hedge. Do you understand what</p> <p>25 I'm saying? So --</p>	<p>256</p> <p>1 themselves write is what you're saying?</p> <p>2 A. That's the position.</p> <p>3 Q. Okay. Let's go to paragraph 55 of that</p> <p>4 exhibit. Do you see a video discussed on June 13th,</p> <p>5 2017?</p> <p>6 A. Yes.</p> <p>7 Q. And that's entitled Media Refuses to Report</p> <p>8 Alex Jones' Real Statements on Sandy Hook?</p> <p>9 A. Yes.</p> <p>10 Q. And you've seen that; right?</p> <p>11 A. If I could just go back to my notes.</p> <p>12 Q. I got a number on that if it will help you.</p> <p>13 A. Yeah, just -- no, just give me one second.</p> <p>14 Q. Okay.</p> <p>15 A. It's fine. The date is fine. 6/13. Yes.</p> <p>16 Q. Okay. Fantastic. Let's see here. This is</p> <p>17 9, is that where we're at?</p> <p>18 MS. OGDEN: 10.</p> <p>19 MR. BANKSTON: 10. Thank you, sir.</p> <p>20 Q. (BY MR. BANKSTON) Do you recognize this from</p> <p>21 the video?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. So this is a screenshot from the June</p> <p>24 13th, 2017 video. And you understand that at one point</p> <p>25 in the video, Mr. Jones puts this list up that</p>
<p>255</p> <p>1 Q. I do. No, I get it. Yeah.</p> <p>2 A. -- Zero Hedge would have -- in publishing the</p> <p>3 article, would have vetted the claim.</p> <p>4 Q. Would they?</p> <p>5 A. That's what the -- so --</p> <p>6 Q. How do you know that?</p> <p>7 A. Because InfoWars' entire premise is you're --</p> <p>8 it's just commentating, like I said. It's a -- it's a</p> <p>9 -- it's a -- it's like a citizen blogger, commentator,</p> <p>10 pundit, whatever. Okay? So we're not doing</p> <p>11 independent -- independent analysis or independent</p> <p>12 journalism or -- I'm not investigating these things.</p> <p>13 We're not investigative reporters.</p> <p>14 So we're pulling other articles from the</p> <p>15 Internet. Those people are writing their articles.</p> <p>16 We've seen those -- the -- those sources have been</p> <p>17 reliable in the past and we are relying on those people</p> <p>18 to vet their own sources.</p> <p>19 Q. Okay.</p> <p>20 A. If they don't vet their own sources, that's</p> <p>21 -- that's on them.</p> <p>22 Q. That's their fault?</p> <p>23 A. That's correct.</p> <p>24 Q. Not on -- not -- InfoWars is hands clean for</p> <p>25 anything they put on the show that they didn't</p>	<p>257</p> <p>1 contained his questions on Sandy Hook; right?</p> <p>2 (Exhibit No. 10 marked.)</p> <p>3 A. Yes.</p> <p>4 Q. (BY MR. BANKSTON) Okay.</p> <p>5 A. So this is -- this is -- just to make sure,</p> <p>6 this is the one -- the video that's in response to the</p> <p>7 Megyn Kelly interview?</p> <p>8 Q. It's actually not in response, it's more</p> <p>9 preemptive. He knows --</p> <p>10 A. That he had already done the interview, but</p> <p>11 it hadn't aired yet. That's right. Exactly.</p> <p>12 Q. Exactly. He knows it's coming out.</p> <p>13 A. Let me just -- if I can, I'm going to go to</p> <p>14 my specific information.</p> <p>15 Q. Okay.</p> <p>16 A. Sorry, this is where I ran out of tabs. At</p> <p>17 some point, you will get to where I didn't run out of</p> <p>18 tabs.</p> <p>19 Q. Okay.</p> <p>20 A. Date, June 13th. Okay. Here we go.</p> <p>21 Q. Okay. Are you ready to talk about this one?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. So what I have in front of you, again,</p> <p>24 that we had talked about was some questions that</p> <p>25 Mr. Jones has that he put up under his What Alex Jones</p>

<p>258</p> <p>1 Really Believes video; right?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. So the first question that we see is</p> <p>4 why does the Sandy Hook Elementary School website have</p> <p>5 zero traffic for four years. Do you see that?</p> <p>6 A. Yes.</p> <p>7 Q. All right. You know where that comes from?</p> <p>8 A. Yes. I believe that the topic -- the source</p> <p>9 for that particular contention was the Wayback Machine.</p> <p>10 Q. All right. So is it your -- so you're --</p> <p>11 first of all, are you saying InfoWars went and figured</p> <p>12 this out, went to the Wayback Machine and came up with</p> <p>13 this theory on its own?</p> <p>14 A. Oh, you mean where is the source -- the</p> <p>15 original source for this belief? I'm not sure. But I</p> <p>16 know that we have amongst our documents a printout from</p> <p>17 the Wayback Machine. So at the very least, if it</p> <p>18 wasn't originated here, it was checked into because we</p> <p>19 have the Wayback Machine.</p> <p>20 Q. Right.</p> <p>21 A. I believe he -- he even put that on -- if it</p> <p>22 wasn't in this video, it might have been in another</p> <p>23 video. He did, like, a screenshot. Like, a desk cam</p> <p>24 --</p> <p>25 Q. Yeah.</p>	<p>260</p> <p>1 that is totally false and not real --</p> <p>2 A. Okay.</p> <p>3 Q. -- comes from Jim Fetzer. You didn't know</p> <p>4 that?</p> <p>5 A. I didn't know that.</p> <p>6 Q. Okay.</p> <p>7 A. I didn't go to the Wayback Machine myself to</p> <p>8 check.</p> <p>9 Q. Well, yeah. I mean, you wouldn't know -- how</p> <p>10 would you even go there? I mean, what -- what would</p> <p>11 you look up?</p> <p>12 A. I don't know. I didn't go to check it out</p> <p>13 myself. All I saw was the document from the Wayback</p> <p>14 Machine. That's all I saw.</p> <p>15 Q. You just saw that there was something from</p> <p>16 the Wayback Machine --</p> <p>17 A. Yes.</p> <p>18 Q. -- which is shown in the video. They show a</p> <p>19 picture of it.</p> <p>20 A. Yes. Yes.</p> <p>21 Q. And you did nothing to follow up to figure</p> <p>22 out where that came from?</p> <p>23 A. I -- aside from looking at the document that</p> <p>24 was produced as the source, no.</p> <p>25 Q. Okay. And so you didn't ask anybody about</p>
<p>259</p> <p>1 A. -- to the Wayback Machine.</p> <p>2 Q. Desk cam of this Wayback Machine stuff?</p> <p>3 A. Yes.</p> <p>4 Q. Where does that come from? Where did he get</p> <p>5 that?</p> <p>6 A. You mean where did he get the idea to go</p> <p>7 there? I don't know.</p> <p>8 Q. I don't think -- he didn't go there.</p> <p>9 A. I'm sorry?</p> <p>10 Q. He didn't go there.</p> <p>11 A. Well --</p> <p>12 Q. That picture, I know where that picture's</p> <p>13 from.</p> <p>14 A. Okay.</p> <p>15 Q. Okay. So I'm trying to figure out if you</p> <p>16 know where that picture's from.</p> <p>17 A. All I can testify is to the document that I</p> <p>18 saw from the Wayback Machine.</p> <p>19 Q. Okay. That's a chapter in Jim Fetzer's book.</p> <p>20 Did you know that?</p> <p>21 A. Okay. I did not know that.</p> <p>22 Q. He wrote a book called Nobody Died at Sandy</p> <p>23 Hook; you know that?</p> <p>24 A. I know he wrote a book, yes.</p> <p>25 Q. Yeah. And the whole Wayback Machine thing</p>	<p>261</p> <p>1 this claim?</p> <p>2 A. About the Wayback Machine?</p> <p>3 Q. Uh-huh.</p> <p>4 A. I asked Alex Jones and Alex Jones' contention</p> <p>5 is that he saw it on the Wayback Machine. I think he</p> <p>6 -- I don't know. I'm pretty sure he testified to it.</p> <p>7 Q. I think you're thinking -- maybe thinking</p> <p>8 Ms. Karpova said that.</p> <p>9 A. Yes, she did. You're right.</p> <p>10 Q. Uh-huh. She just said the Wayback Machine.</p> <p>11 A. The Wayback Machine.</p> <p>12 Q. Like as though that's a source or something;</p> <p>13 right? Like -- like, but what I was trying to figure</p> <p>14 out --</p> <p>15 A. Well, I mean, it is a -- it is a source.</p> <p>16 Whether it's an accurate source or not is up for</p> <p>17 debate. But it -- it is a -- source, all that means is</p> <p>18 where does this information come from as far as your --</p> <p>19 Q. Yeah, but what I'm getting at is that -- that</p> <p>20 screenshot --</p> <p>21 A. Yes.</p> <p>22 Q. -- isn't it just a screenshot of the web page</p> <p>23 the Wayback Machine?</p> <p>24 A. Uh-huh.</p> <p>25 Q. It's a screenshot of some stuff, some various</p>



<p style="text-align: right;">262</p> <p>1 stuff from the Wayback Machine. Somebody put that 2 together. 3 A. I don't know who put that together. 4 Q. Okay. And so if it was Mr. Fetzer, you 5 wouldn't know anything about that? 6 A. I don't know. 7 Q. Okay. Several reports of other shooters 8 dressed in camouflage who fled into the woods, one of 9 whom police allegedly detained. Where does that come 10 from? What are those reports? 11 A. Actually, there were a few reports. So on 12 the day of the shooting, and this is pretty common when 13 there are active shooter events -- 14 Q. Uh-huh. 15 A. -- for there to be incoming news or breaking 16 news that maybe necessarily won't be accurate at 17 particular time, but would be checked later on and may 18 be clarified. But on the day of the shooting, 19 Mr. Jones did cut to a couple of different sources for 20 this claim. 21 The first claim being that there was some 22 helicopter footage of someone running around in the 23 woods. He did cut to that footage. There were also a 24 couple of other news sources that -- that cut -- that 25 listed possible second shooter. Then, there are also</p>	<p style="text-align: right;">264</p> <p>1 media all over the place, that's not a second shooter; 2 right? 3 A. I don't -- 4 Q. Do you agree with that? 5 A. Well, first of all, I don't know if that 6 person that was running and being chased in the woods 7 was a reporter. There were also some secondary reports 8 of an off-duty SWAT officer that was found in the 9 woods. I don't know if that's the same person. So 10 yeah, there -- it could -- there -- 11 Q. You're saying -- 12 A. -- could be any number of reasons why 13 someone's running around in the woods. 14 Q. You're saying a SWAT officer was detained in 15 those woods? 16 A. So I think that after those -- those articles 17 -- not articles, but reports of a possible second 18 shooter and this person being taken out in handcuffs, 19 because of the video footage and the question of there 20 being a potential shooter, it came out somewhere that 21 there was an off-duty SWAT officer that was in the 22 woods at that time. 23 Q. Or just -- have you been able to find that? 24 A. The reports of that? 25 Q. Any of the -- I mean, any of these.</p>
<p style="text-align: right;">263</p> <p>1 -- there was a -- there was a interview with a person 2 on the scene who says that he saw someone being taken 3 out of the woods dressed in camouflage and handcuffs. 4 And he cut to the video footage of that particular 5 individual. 6 Q. Okay. So let's talk about this first one, 7 this helicopter footage. 8 A. Yes. 9 Q. Do you understand there's helicopter footage 10 of some people in the woods and the police questioning 11 them? 12 A. Whether that particular person was 13 questioned, I don't know. But the -- the purpose of 14 that footage was just to show that there were people 15 chasing someone else in the woods. So -- 16 Q. Okay. Those -- those, though, that video 17 comes from well into the afternoon well after the 18 shooting; right? Did you know that? 19 A. I know there is a timestamp on the video, 20 yes. 21 Q. Okay. And so if you were to see that, you -- 22 and because those are reporters is that what is. 23 There's some reporters who started walking into the 24 woods. If -- if there's a video that's taken hours 25 after everything's all over and there's all sorts of</p>	<p style="text-align: right;">265</p> <p>1 A. Yeah. I -- yeah. Yeah. That's in the 2 disclosures. But I will say, I mean, I -- 3 Q. Hold on. Whoa. Whoa. Back up. Hold on. 4 What does disclosures mean? What do you mean? 5 A. I mean it's in the discovery material that I 6 was reviewing -- that I reviewed. It's in one of the 7 documents. But also, I just will say that -- 8 Q. Okay. 9 A. -- it's pretty common for that day. I mean, 10 I lived in Connecticut. The SWAT -- SWAT teams from 11 all over the state were called in. So it wasn't really 12 something that was out of the realm that it would be an 13 -- a SWAT officer out there. 14 Q. You're just speculating on that. 15 A. I'm not -- I know that other -- 16 Q. Based on your own personal life of what you 17 think goes on in law enforcement. But you cannot tell 18 me if there was a single person on scene that day 19 dressed in SWAT gear, can you? 20 A. Actually, yes, I can. 21 Q. Okay. 22 A. Just because we pointed to the evidence that 23 was in the record of a person who was taken out of the 24 woods in SWAT gear. And secondly, there was an -- a 25 statement put out that there was an officer -- an</p>

<p>266</p> <p>1 off-duty officer taken off the property. So --</p> <p>2 Q. Right. So he's not in SWAT gear.</p> <p>3 A. I don't know whether he was in SWAT gear.</p> <p>4 Q. You think SWAT officers walk around off duty</p> <p>5 geared up in SWAT material?</p> <p>6 A. Depends.</p> <p>7 Q. Does it?</p> <p>8 A. Yeah, it does.</p> <p>9 Q. So -- never mind. That's ridiculous. Okay.</p> <p>10 Let's go to the next question here. Why was -- why</p> <p>11 were port-o-potties, sandwich, fruits, drinks, and</p> <p>12 chips brought and set up for people at the crime scene</p> <p>13 to eat inside the school. What's the source for that?</p> <p>14 A. So I think that the source of this in just my</p> <p>15 discussions with -- with all the various employees</p> <p>16 were, this was one of or maybe two of Halbig's 16</p> <p>17 questions that he asked and that he found to be, quote,</p> <p>18 unquote, anomalies in his opinion.</p> <p>19 Q. Okay. So how do you know that's -- so how</p> <p>20 did they know that's Halbig's stuff is just -- just</p> <p>21 personal knowledge of the employees you talked to is</p> <p>22 what you're saying?</p> <p>23 A. How do I know this is Halbig's stuff?</p> <p>24 Q. Yeah.</p> <p>25 A. All of this -- these questions -- these</p>	<p>268</p> <p>1 A. He was the source for those particular</p> <p>2 claims.</p> <p>3 Q. InfoWars has done absolutely nothing to</p> <p>4 verify any of that claim beyond just listening to</p> <p>5 Halbig?</p> <p>6 A. No, there's been no independent research into</p> <p>7 those claims.</p> <p>8 Q. InfoWars has never seen a video of anybody</p> <p>9 eating food inside the school or anything like that?</p> <p>10 A. I -- no. To my knowledge, I don't think</p> <p>11 there's ever been any video footage from the inside of</p> <p>12 the school.</p> <p>13 Q. Okay. As far as the port-o-potties, InfoWars</p> <p>14 never did anything to verify when those showed up;</p> <p>15 right?</p> <p>16 A. No. I -- I believe that was the subject of</p> <p>17 Mr. Halbig's FOIA request. But -- and then those were</p> <p>18 covered in subsequent broadcasts, his attempts to get</p> <p>19 that information.</p> <p>20 Q. You know InfoWars has made attempts to secure</p> <p>21 the dashcam -- dashcam cameras of the police cars that</p> <p>22 were sitting in the parking lot?</p> <p>23 A. Has InfoWars? I'm -- honestly, I -- I don't</p> <p>24 know. I know Halbig has. I know Halbig was -- went up</p> <p>25 and did a FOIA request and he was disclosed that --</p>
<p>267</p> <p>1 particular questions really didn't appear until</p> <p>2 Halbig's first interview. In Halbig's first interview,</p> <p>3 he does go over these particular allegations.</p> <p>4 Q. Okay. So let's -- stop talking allegations</p> <p>5 plural because we know number one allegation about the</p> <p>6 Wayback Machine, Halbig's never said anything about</p> <p>7 that; right?</p> <p>8 A. No. I'm talking about -- we're still on the</p> <p>9 same bullet point.</p> <p>10 Q. Right.</p> <p>11 A. But the reason why I'm breaking it up is</p> <p>12 because -- I don't want to write on this, this is an</p> <p>13 exhibit. But port-o-potties, he made one allegation --</p> <p>14 I don't know if you've read Mr. Halbig's 16 points, but</p> <p>15 he breaks these down into separate points. One was the</p> <p>16 port-o-potties. Another was the sandwiches and fruit</p> <p>17 drinks that were brought in --</p> <p>18 Q. Got you.</p> <p>19 A. -- for the -- the officers and eaten at a</p> <p>20 various -- whatever point in time he was claiming. And</p> <p>21 then that -- and then there was a separate one where he</p> <p>22 was saying that people were eating lunch inside the</p> <p>23 school amongst the crime scene.</p> <p>24 Q. Okay. And InfoWars just took Halbig's word</p> <p>25 for this; right?</p>	<p>269</p> <p>1 well, maybe not disclosed. But he was given the</p> <p>2 opportunity to view the dashcam footage.</p> <p>3 Q. Rob Dew's also talked about the dashcam</p> <p>4 footage; right?</p> <p>5 A. He has, yes.</p> <p>6 Q. Okay. So InfoWars knows that there's a video</p> <p>7 recording of everything that shows up into that parking</p> <p>8 lot?</p> <p>9 A. I don't want to say everything. Dashboard --</p> <p>10 dashboard cam does not capture everything. But there</p> <p>11 is dashboard camera footage of the parking lot.</p> <p>12 Q. Dashcam footage might have trouble detecting</p> <p>13 a mosquito showing up in that parking lot; right?</p> <p>14 A. Well, I'm not talking about mosquitos, sir.</p> <p>15 I'm talking about, like, angles. I don't know if it</p> <p>16 picked up the entire parking lot. Not every car at</p> <p>17 that time had dashboard camera footage. Now, body</p> <p>18 camera footage is very prolific. But at that time, I</p> <p>19 don't think anybody had body camera footage.</p> <p>20 So when I say I don't know if it captured</p> <p>21 everything, I don't know what the angles of those</p> <p>22 dashboards -- the dashboard cameras are. So I'm not</p> <p>23 talking about mosquitos. I'm talking about angles and</p> <p>24 whether it captured the entire parking lot.</p> <p>25 Q. And the company doesn't know any of that</p>

<p>270</p> <p>1 either; right?</p> <p>2 A. No.</p> <p>3 Q. Never tried to find out; right?</p> <p>4 A. No. As I said, we didn't do any independent</p> <p>5 research into this.</p> <p>6 Q. Okay. Let's go to the next one, Sandy Hook</p> <p>7 Father Robbie Parker Getting Into Character.</p> <p>8 A. Yes.</p> <p>9 Q. That's the -- that's -- that's an allegation</p> <p>10 from inside InfoWars; right? That doesn't come from</p> <p>11 any source, that's just Mr. Jones and Mr. Dew saying</p> <p>12 they believe Robbie Parker looks like an actor; right?</p> <p>13 A. So -- so -- yes. I think that originally,</p> <p>14 this -- this is an opinion of the -- the video that</p> <p>15 they viewed of Mr. Parker before giving that interview.</p> <p>16 I believe it was the same day.</p> <p>17 And I'm sure, as you know, Mr. Dew is a -- or</p> <p>18 was a theater major. And so in his opinion based on</p> <p>19 his studies when he saw that video, he believed it was</p> <p>20 getting into character.</p> <p>21 Q. What does the company believe was happening</p> <p>22 there?</p> <p>23 A. On that video?</p> <p>24 Q. Uh-huh.</p> <p>25 A. I mean, this goes into the distinction we've</p>	<p>272</p> <p>1 Q. Does the company --</p> <p>2 A. It's an opinion that --</p> <p>3 Q. Right. Okay.</p> <p>4 A. -- belongs to two individual people.</p> <p>5 Q. Is the company --</p> <p>6 A. And the company doesn't have a belief that --</p> <p>7 that it's getting into character, but it's based on</p> <p>8 their opinion.</p> <p>9 Q. Who owns the company, now, again?</p> <p>10 A. Alex Jones owns the company.</p> <p>11 Q. Okay.</p> <p>12 A. He's an individual, though.</p> <p>13 Q. So does the company feel embarrassed by what</p> <p>14 Mr. Jones or Mr. Dew said about Mr. Parker?</p> <p>15 A. No, I think it's an opinion.</p> <p>16 Q. Does the company feel any remorse about what</p> <p>17 Mr. Jones or Mr. Dew said about Mr. Parker?</p> <p>18 A. Remorse? Do I think that the company feels</p> <p>19 bad that Mr. Parker was upset about the coverage?</p> <p>20 Sure. But as far as the statement, it's -- it's an</p> <p>21 opinion. And it's -- could be drawn from, you know, it</p> <p>22 is a -- an opinion that could be drawn from what you</p> <p>23 see on that video.</p> <p>24 Q. Okay. So in other words, the company may</p> <p>25 have a greater latitude in terms of what it may think</p>
<p>271</p> <p>1 been talking about, about how individual people in the</p> <p>2 -- in the company have their own positions. But the</p> <p>3 company does not have a position on that issue. I</p> <p>4 don't have an opinion on whether that was getting into</p> <p>5 character.</p> <p>6 Q. How does the company feel about Mr. Jones and</p> <p>7 Mr. Dew saying that?</p> <p>8 A. I think that that's their opinion and they're</p> <p>9 entitled to it.</p> <p>10 Q. No. Okay. I can understand that's what the</p> <p>11 company may feel about their right or their ability to</p> <p>12 say it.</p> <p>13 A. Uh-huh.</p> <p>14 Q. Does the company have an opinion on what they</p> <p>15 said?</p> <p>16 A. On whether or not this was getting into</p> <p>17 character and whether it was nice?</p> <p>18 Q. No, not necessarily that so much. Not so</p> <p>19 much the accuracy. But sort of, like, is the company</p> <p>20 proud of that?</p> <p>21 A. Am I proud of the --</p> <p>22 Q. What Mr. Jones and Mr. Dew said about</p> <p>23 Mr. Parker. Is the company proud of that?</p> <p>24 A. I don't think the company takes a position on</p> <p>25 it.</p>	<p>273</p> <p>1 is appropriate or not appropriate or what it may be</p> <p>2 embarrassed of or proud of or remorseful for. It may</p> <p>3 matter whether the thing being said is a fact or an</p> <p>4 opinion; right?</p> <p>5 A. Sure.</p> <p>6 Q. Okay. So there are -- this particular thing,</p> <p>7 you can say, for instance, this is not something that's</p> <p>8 -- this is a personal viewpoint. I saw that and it</p> <p>9 looked -- this is how it looked to me. So that's</p> <p>10 clearly an opinion; right?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. There are other things Jones and</p> <p>13 InfoWars have said about Sandy Hook that are not</p> <p>14 opinions, they are very much statements of fact. You</p> <p>15 would agree with that?</p> <p>16 A. I would agree that they have stated pieces of</p> <p>17 information that have been gleaned from other sources</p> <p>18 and taken those as fact.</p> <p>19 Q. Well -- and let's go back to the Wayback</p> <p>20 Machine thing.</p> <p>21 A. Yes.</p> <p>22 Q. Right? Nobody -- they're not repeating</p> <p>23 anybody's words there, according to you. They just --</p> <p>24 that's the source is the Wayback Machine. They said</p> <p>25 that; right? InfoWars said this is what the Wayback</p>

<p>274</p> <p>1 Machine says; right?</p> <p>2 A. I think we said, I'm not really sure where</p> <p>3 that original -- originally came --</p> <p>4 Q. Okay.</p> <p>5 A. How that came to their attention, I'm not</p> <p>6 sure --</p> <p>7 Q. Okay.</p> <p>8 A. -- how it originally came -- but I know that</p> <p>9 he put that screenshot on his camera.</p> <p>10 Q. And have never tracked down that screenshot</p> <p>11 or where it came from; right?</p> <p>12 A. I don't know where the screenshot came from.</p> <p>13 Q. Got you. Okay. An FBI crime stat which says</p> <p>14 no murders occurred in Newtown in 2012.</p> <p>15 A. Yes.</p> <p>16 Q. That's a piece of InfoWars' independent</p> <p>17 research; right? Nobody else researched that?</p> <p>18 A. Yeah. So that was -- I did speak to our</p> <p>19 staff on this particular claim. So this is a source</p> <p>20 that was actually sourced from the FBI.gov website, a</p> <p>21 screenshot of which was put onto and attached to the</p> <p>22 article. It was written by Adan Salazar. I think you</p> <p>23 -- he was deposed in connection with this article.</p> <p>24 Q. Not here. Just wanted to make sure you</p> <p>25 understand not in Texas.</p>	<p>276</p> <p>1 statistics.</p> <p>2 Q. Okay. Just to make sure that you're not</p> <p>3 putting things on the record that are evidence; right?</p> <p>4 A. Sure.</p> <p>5 Q. They absolutely one hundred percent do report</p> <p>6 to the FBI. There's actually a 500-page report that</p> <p>7 that chart is generated from. It has departments from</p> <p>8 every department in Connecticut.</p> <p>9 A. Yeah.</p> <p>10 Q. Has for the Connecticut State Police list the</p> <p>11 27 children murdered at Sandy Hook has an asterisk</p> <p>12 saying these are the 27 -- I just wanted to make sure</p> <p>13 you understand that is reported.</p> <p>14 A. Okay. At the bottom of that article. Not</p> <p>15 the article, but at the bottom of the FBI.gov, all</p> <p>16 that's really in there is the asterisk. It does not</p> <p>17 include state police statistics. That's all it says.</p> <p>18 Q. Right.</p> <p>19 A. So you would -- he would have had to go and</p> <p>20 research the reason why that the state police do -- did</p> <p>21 not report for that particular -- those particular</p> <p>22 numbers and things like that.</p> <p>23 Q. Or he would need to pull up the document</p> <p>24 referred to on that chart, the UCR. You know what the</p> <p>25 UCR is?</p>
<p>275</p> <p>1 A. Yeah. It might -- you're right, it was in</p> <p>2 Connecticut. And so essentially what happened with the</p> <p>3 article -- and it was not reported from another source.</p> <p>4 He -- so it was original reporting on -- in -- in the</p> <p>5 context of Mr. Salazar because it was not found from</p> <p>6 another source.</p> <p>7 He went to the FBI.gov and he saw this. And</p> <p>8 then the problem with the number, it does say zero for</p> <p>9 Newtown for 2012. But the problem for the --</p> <p>10 Q. Does it, or does it say that for Newtown</p> <p>11 Police Department?</p> <p>12 A. If you'd let me finish. What it says is the</p> <p>13 FBI.gov stats is per town, not per department. So per</p> <p>14 town, Newtown says zero. But if you scroll to the very</p> <p>15 bottom, like at the end of the list of towns, there is</p> <p>16 an asterisk that says the state police do not report to</p> <p>17 the FBI. So that is the source of the confusion, so to</p> <p>18 speak, or the error --</p> <p>19 Q. Error?</p> <p>20 A. -- for that particular stat. But it does</p> <p>21 say -- if you scroll down to Newtown, it does say zero.</p> <p>22 But he didn't scroll all the way down the page to see</p> <p>23 the asterisk. And honestly, I don't know the answer as</p> <p>24 to why the state police don't report to the FBI. Every</p> <p>25 other department individually reports to the FBI their</p>	<p>277</p> <p>1 A. Right. But what I'm saying is he didn't</p> <p>2 scroll all the way to the bottom.</p> <p>3 Q. No. But up at the top of the document.</p> <p>4 A. Oh, okay.</p> <p>5 Q. Where it says that these figures on here come</p> <p>6 from the UCR --</p> <p>7 A. Okay.</p> <p>8 Q. -- he never went and got the UCR?</p> <p>9 A. No. No.</p> <p>10 Q. Okay.</p> <p>11 A. All he did was look at the chart, saw the</p> <p>12 big, fat zero, and then reported it.</p> <p>13 Q. All right. And we talked about how this</p> <p>14 didn't come from anybody else, this was independent</p> <p>15 research done by InfoWars on Sandy Hook; right?</p> <p>16 A. Right. That was a report that he did not get</p> <p>17 from someplace else. Apparently, as far as I know, it</p> <p>18 was something that somebody had seen. He might've</p> <p>19 gotten a tip on, you know, hey, look, this looks weird.</p> <p>20 Go check it out. And saw it and then he reported on it</p> <p>21 himself.</p> <p>22 Q. That's a guess, though?</p> <p>23 A. No. That's -- when I talked to Adan, that's</p> <p>24 what he told me, that he got a tip.</p> <p>25 Q. No -- oh, so he did -- this isn't maybe he</p>

<p>278</p> <p>1 got a tip, he did get a tip?</p> <p>2 A. No, he got a tip. And, I mean, if you're</p> <p>3 asking me, he went just randomly to the FBI database</p> <p>4 because he wanted to check, no. He got a tip. Hey,</p> <p>5 check this out, this looks weird, and he looked at it.</p> <p>6 Q. Who tipped him out?</p> <p>7 A. So that -- that's a source of confliction.</p> <p>8 I'm not really sure. So he said he thinks that</p> <p>9 Mr. Daniels tipped it. But Mr. Daniels said he doesn't</p> <p>10 recall ever tipping him out on that.</p> <p>11 Q. Okay.</p> <p>12 A. So in all honesty, I'm not sure where that</p> <p>13 tip came from. But Adan's position is that it was a</p> <p>14 tip.</p> <p>15 Q. One thing we do know is InfoWars does do</p> <p>16 independent research, investigative journalism into</p> <p>17 Sandy Hook?</p> <p>18 A. I would say that on the whole, the answer is</p> <p>19 no. These are very out-of-character articles that we</p> <p>20 do not usually publish. So there were a couple here</p> <p>21 that Adan did that I -- as I said earlier, Adan was</p> <p>22 more into this than most of the other people involved</p> <p>23 in -- in InfoWars.</p> <p>24 And so he did a couple of independent pieces</p> <p>25 that really were out of -- out of the realm of what is</p>	<p>280</p> <p>1 thought was interesting and cool was that, oh, look.</p> <p>2 Here's this -- this common denominator -- not a common</p> <p>3 denominator. But look, Sandy Hook is referenced here</p> <p>4 and it wasn't referenced in the first video. And then</p> <p>5 he was interested because he thought that the names and</p> <p>6 the commonality between the names was cool. He did a</p> <p>7 similar article about a slasher thriller thing --</p> <p>8 Q. I was about to ask you.</p> <p>9 A. -- Sandy Hook too. Which he just found to be</p> <p>10 interesting just because of the name commonality. But</p> <p>11 as far as the other things sourced in there, I don't</p> <p>12 know that he thought that was cool. But the name</p> <p>13 commonality, I think, he thought was cool.</p> <p>14 Q. Let's take a detour over to the slasher film.</p> <p>15 A. Sure.</p> <p>16 Q. Sandy Hook Lingerie Party Massacre.</p> <p>17 A. Yes.</p> <p>18 Q. Okay. You -- you've read documents about</p> <p>19 that?</p> <p>20 A. I believe I read the article and I spoke to</p> <p>21 Adan about it, yes.</p> <p>22 Q. And you've got e-mails that he sent to people</p> <p>23 about it; right?</p> <p>24 A. He did tell me he reached out to the producer</p> <p>25 of that video.</p>
<p>279</p> <p>1 usually done by the company. So, like, for example, he</p> <p>2 did that Batman article. I don't know if you read</p> <p>3 that.</p> <p>4 Q. I know about that one.</p> <p>5 A. Right. So he got a tip from somebody on</p> <p>6 social media and -- and saw that -- like, oh, okay.</p> <p>7 Wow. That looks pretty cool. And he -- he did this</p> <p>8 dive into, you know, the three Batman movies and then</p> <p>9 what that area was called in the comics, and then he</p> <p>10 wrote that article.</p> <p>11 So that was independent reporting on his</p> <p>12 part. It's out -- it's really not the usual piece that</p> <p>13 the company would do.</p> <p>14 Q. When -- when Adan got tipped off that the</p> <p>15 appearance of the name Sandy Hook on the Dark Knight</p> <p>16 map could suggest predictive programming that suggests</p> <p>17 foreknowledge of the Sandy Hook attack being staged by</p> <p>18 globalist illuminati types, he thought that was cool?</p> <p>19 A. Does he think it's cool? Is that a question?</p> <p>20 Q. No. Did -- he did. He did think that was</p> <p>21 cool.</p> <p>22 A. Are you asking me whether he did --</p> <p>23 Q. That's the word you used, I'm just trying to</p> <p>24 confirm it.</p> <p>25 A. I -- no. I don't -- I think that what he</p>	<p>281</p> <p>1 Q. Have you seen those -- those e-mails? Those</p> <p>2 have been in deposition before.</p> <p>3 A. Yeah, I don't know if I've read the specific</p> <p>4 e-mails. I may have, but I just don't remember. I</p> <p>5 know they exist, though.</p> <p>6 Q. I'm just -- I'm just trying to remember if</p> <p>7 you remember Adan saying to that person who ran that</p> <p>8 horror slasher movie blog, we know this is ridiculous,</p> <p>9 but we're going to run it anyway. Do you remember him</p> <p>10 saying that to him?</p> <p>11 A. I don't dispute -- I don't remember it, in</p> <p>12 all honesty. But he could have very well said that.</p> <p>13 Q. Okay. And --</p> <p>14 A. All it is, is just an interesting commonality</p> <p>15 between the names, that's all.</p> <p>16 Q. Well, actually, no. Mr. Salazar wrote an</p> <p>17 e-mail to the guy who ran that blog basically accusing</p> <p>18 him of foreknowledge of the Sandy Hook attack, didn't</p> <p>19 he?</p> <p>20 A. Oh, I don't know. I didn't read any e-mail</p> <p>21 like that.</p> <p>22 Q. So you don't remember -- you didn't read an</p> <p>23 e-mail back from the guy at the horror blog telling me,</p> <p>24 don't ever contact me again, you bunch of weirdos?</p> <p>25 A. No, I didn't read any e-mail like that. When</p>

<p style="text-align: right;">282</p> <p>1 I spoke to Adan, Adan's position was that he received a 2 response back from the producer that he had received a 3 lot of communication about the name of the video 4 following Sandy Hook and that he wanted to be left 5 alone and he thought it was ridiculous. 6 Q. Okay. This next statement on the chart here 7 that says, why didn't they let paramedics and EMTs into 8 the building after 27 children declared dead in eight 9 minutes -- 10 A. Uh-huh. 11 Q. -- where does that come from? 12 A. So this is another of Halbig's 16 points. 13 And it's not just one point. It's a couple of points 14 he breaks it down into. So he breaks it down into one, 15 why didn't they let paramedics and EMTs in the 16 building. And two, children were declared dead within 17 eight minutes. 18 Q. Okay. 19 A. So the source -- the original source of that 20 is Mr. Halbig. 21 Q. InfoWars did nothing to check that; right? 22 A. No. 23 Q. Because we know paramedics and EMTs were let 24 in the building. 25 A. They were. I did read the portions of the</p>	<p style="text-align: right;">284</p> <p>1 mischaracterization of that same claim, that the house 2 is no longer standing. 3 Q. Mischaracterization by Jones himself? 4 A. That it was burned instead of being 5 bulldozed. 6 Q. Sure. That's what I'm trying to -- that's -- 7 A. Yes. 8 Q. -- Mr. Jones who did that. It's not -- it's 9 not somebody else was responsible for telling Jones 10 that it was burned down? 11 A. No. 12 Q. Mr. Jones just mischaracterized -- 13 A. Right. I think that it's a 14 mischaracterization of the fact that the house is no 15 longer standing. 16 Q. Okay. 17 A. It wasn't necessarily burned down. 18 Q. Okay. Can you go to -- in your petition, can 19 you go to paragraph 54 for me. 20 A. Sure. 21 Q. And let's just do a couple of others and then 22 we'll take a break if that sounds good to you. 23 A. Sure. I could -- I could use the bathroom. 24 That would be great. 25 Q. Okay. Let's get through this one here. This</p>
<p style="text-align: right;">283</p> <p>1 final Sandy Hook report. 2 Q. And that's something InfoWars had in its 3 possession that Rob Dew went out and got in 2013; 4 right? 5 A. I don't know if he went out and got it, but 6 it was sent to him. It was in an e-mail chain. He did 7 receive it. 8 Q. Yeah. 9 A. Yes. 10 Q. And he's actually talked about it with other 11 people? 12 A. I don't know if he talked about it with other 13 people, but I know they had it. 14 Q. The next one is why was Adam Lanza's home 15 burned down by the bank. Where does that come from? 16 A. This -- this might be a mischaracterization 17 of the claim that Adam Lanza's house was -- was 18 bulldozed. I don't think it was burned down. But I 19 think it's the claim -- this goes back to that claim 20 that the -- the house was taken down. 21 Q. All right. I understand we know about 22 something from property records or something about 23 bulldozing. But what I'm wondering is how did -- how 24 did we get to burn down? 25 A. That's why I'm saying it's -- I think it's a</p>	<p style="text-align: right;">285</p> <p>1 is Sandy Hook Vampires Exposed on April 22nd, 2017. 2 You're familiar with that video; right? 3 A. Yes. Let me just go back to my chart. 4 Q. And I'll just ask you while you're looking, 5 because I'm sure you'll pull it up, you did watch this 6 video? 7 A. Yes, I remember watching this video. 8 Q. Okay. 9 A. Yeah. Sandy Hook Vampires Exposed, yes. 10 Q. Okay. So this video repeats a bunch of 11 things said by Mr. Halbig. You'd agree with that? 12 A. Yes. Just give me one second while I can 13 pull up that -- my detailed notes on that video. Okay. 14 What was your question? 15 Q. First of all, is -- I was wondering, what's 16 -- is there any particular significance to the orange 17 and yellow on these charts? 18 A. That's just to differentiate between where it 19 ends. Where one video ends and one video begins -- 20 Q. That's what I thought. 21 A. -- just so I can -- so I can easily see where 22 the notes for one end and one begins. 23 Q. Okay. The question was, this video has a 24 bunch of stuff from Wolfgang Halbig. A bunch of 25 different claims from Wolfgang Halbig that are being</p>

<p>286</p> <p>1 repeated in this video.</p> <p>2 A. So this -- this is -- if I recall correctly,</p> <p>3 this was an extremely long video. There were a lot of</p> <p>4 things that were talked about in this video. But some</p> <p>5 of the things that are in this video, for example, they</p> <p>6 also talk about Pizzagate, Iraq -- children die in</p> <p>7 Iraq, WMDs. There's a lot of things that are talked</p> <p>8 about in this video. It's a long video.</p> <p>9 Q. Right.</p> <p>10 A. So -- but yes.</p> <p>11 Q. Well, how long are InfoWars' videos usually?</p> <p>12 A. Well, that depends because Mr. Jones is going</p> <p>13 to do -- he'll do a three-hour -- three three-hour</p> <p>14 segments. And those will be broken up sometimes into</p> <p>15 shorter clips. Or sometimes, it will be just kept as</p> <p>16 longer clips. So, like, some of these videos were two</p> <p>17 hours long.</p> <p>18 Q. Okay. This one, what do we -- do you think</p> <p>19 this is one of those?</p> <p>20 A. I think this was a very long video.</p> <p>21 Q. I think it may be less than half that,</p> <p>22 actually.</p> <p>23 A. I don't think it was two hours, but it was a</p> <p>24 long video.</p> <p>25 Q. Right. I think it's actually about 39</p>	<p>288</p> <p>1 Q. Okay. Well, what I'm trying to understand is</p> <p>2 that some videos, for instance, Owen Shroyer's little</p> <p>3 five-minute video about Mr. Heslin.</p> <p>4 A. Yes.</p> <p>5 Q. That's a clip from a full -- full episode of</p> <p>6 the Alex Jones show. It's a four-hour show. Okay?</p> <p>7 There are other videos here. For instance, the video</p> <p>8 we just talked about, What Alex Jones Really Believes</p> <p>9 about Sandy Hook. That wasn't from an InfoWars</p> <p>10 episode; right? Because that's just recorded inside</p> <p>11 Mr. Jones' home. Do you understand?</p> <p>12 A. You know what, I'm not a hundred percent sure</p> <p>13 on that. I'm sorry.</p> <p>14 Q. Okay. But in other words, there are some</p> <p>15 times where he might make a little special video just</p> <p>16 inside his home. Might be a few minutes long.</p> <p>17 A. Yeah.</p> <p>18 Q. Sometimes, they're going to come from a full</p> <p>19 InfoWars show. Sometimes, he might make special video.</p> <p>20 A. Yes.</p> <p>21 Q. Like, I have a special video about Russiagate</p> <p>22 and it's 20 minutes long.</p> <p>23 A. Yes.</p> <p>24 Q. All right? Okay. This video, does this come</p> <p>25 from an Alex Jones show? Because I'm trying --</p>
<p>287</p> <p>1 minutes.</p> <p>2 A. No, it's longer. So I have notes up here,</p> <p>3 for example, 59 minutes, 60 minutes. It's at least an</p> <p>4 hour long.</p> <p>5 Q. Let's see.</p> <p>6 A. So -- see, this one, we have it as -- we have</p> <p>7 saved it as a video file. A video file that we have is</p> <p>8 -- I'll read to you the name. RUN1JKHWTXL. And that</p> <p>9 video file was an hour long. So, you know, you may be</p> <p>10 -- it may be accurate that it -- there were some clips</p> <p>11 that were shorter that you may have -- you may have</p> <p>12 access to. But it is in -- it is a part of a larger</p> <p>13 video file.</p> <p>14 Q. Okay. Well, I'm not sure I have that.</p> <p>15 Excuse me. Sorry, the volume's on. Okay. So is it</p> <p>16 your understanding that this came out of a larger</p> <p>17 four-hour video?</p> <p>18 A. I don't know if it was four hours, but this</p> <p>19 clip, that particular clip, that -- I don't want to say</p> <p>20 clip, but that particular segment for -- let's see.</p> <p>21 I'm sorry, I lost my place.</p> <p>22 Q. April 22nd, 2017.</p> <p>23 A. No, no. I'm just looking for the title. So</p> <p>24 Sandy Hook Vampires Exposed, what we have for that</p> <p>25 title is this longer one-hour long video.</p>	<p>289</p> <p>1 A. Yeah.</p> <p>2 Q. -- to find the full video.</p> <p>3 A. Yeah. I -- so like I said, our full video,</p> <p>4 it looks like it was from a full show and it was more</p> <p>5 than an hour long. It was at least an hour long. My</p> <p>6 notes go up to an hour.</p> <p>7 Q. Well, no. That's what I'm trying to get at.</p> <p>8 An episode of The Alex Jones Show is four hours long.</p> <p>9 So does this come --</p> <p>10 A. They're -- they're -- they're three-hour</p> <p>11 segments. So they're three-hour segments. You mean --</p> <p>12 do you mean all three-hour segments? There are three</p> <p>13 three-hour segments?</p> <p>14 Q. No. I mean, in general, including the pill</p> <p>15 stuff where they're selling the pills and going off on</p> <p>16 that.</p> <p>17 A. Uh-huh.</p> <p>18 Q. It takes -- you -- you -- you start watching</p> <p>19 an Alex Jones episode, it's four hours is the amount of</p> <p>20 time that passes when it signs off.</p> <p>21 A. Oh, okay. So the way that the files are</p> <p>22 saved by the company, they're not saved in four-hour --</p> <p>23 four-hour chunks like that.</p> <p>24 Q. Okay.</p> <p>25 A. So this particular video file that has this</p>

<p>290</p> <p>1 particular title, Sandy Hook Vampires Exposed, on this 2 date, that's our -- our name for the document and it's 3 not four hours long. 4 Q. Do you possess -- does the company possess 5 the entire episode of The Alex Jones Show on April 6 22nd, 2017? 7 A. I possess this -- this -- this video under 8 that name, you know, the RUN name. It's not four 9 hours, though. 10 Q. The thing is, is yeah, the name Sandy Hook 11 Vampires Exposed, for instance, is a YouTube title; 12 right? 13 A. Right. 14 Q. And that's not going to be the -- 15 A. No, but it's the date of that video. It's 16 the same date. 17 Q. Correct. 18 A. Right. Right. 19 Q. You're 100 percent right on that. And, in 20 fact, what's weird about the InfoWars thing, the -- for 21 instance, the Owen Shroyer video is June 26, 2017. 22 That actually didn't happen that day. That was 23 actually an Alex Jones episode from June 25th. 24 A. Right. Those were the upload dates. 25 Q. Right.</p>	<p>292</p> <p>1 A. -- in all honesty. And I don't -- 2 Q. All right. 3 A. -- and, like I said, this -- this video, it's 4 -- this is how it's saved on, you know, on our system. 5 Q. Okay. We've talked, I think, about one of 6 the claims in this video, which is that the police 7 found people in the backwoods dressed up in SWAT gear. 8 Does the company contend that that is true? 9 A. One second. I think that he was specifically 10 referencing the issue that we were talking about 11 earlier about the individual that was pulled out of the 12 woods and put into the back of the police car and he 13 was wearing SWAT gear. 14 Q. Okay. 15 A. So that was the basis for that particular 16 claim. 17 Q. Is that true? 18 A. There is video of an interview with a person 19 who says he saw a person being taken out of the woods 20 in SWAT gear. 21 Q. Really? 22 A. Yes. 23 Q. Okay. Have you seen that video? 24 A. I have. 25 Q. Okay. So if I needed that, I could get a</p>
<p>291</p> <p>1 A. Right. 2 Q. So what I'm trying to figure out is some day, 3 there was a full episode of The Alex Jones Show which 4 included all these comments that are now in Sandy Hook 5 Vampires Exposed. Does the company have that full 6 episode? Because we know this video is not the full 7 episode. 8 A. Right. So the video that I have is 9 definitely longer than the video you have if you say 10 it's only, you know, 40 minutes long. This video that 11 I have for -- 12 Q. Okay. 13 A. -- that title on that date is definitely 14 longer than that. So I don't know if you don't have 15 this -- this length of the video. And it could be 16 produced to you. That -- that's fine. 17 Q. No. What I'm saying -- 18 A. But I don't know if your question to me is, 19 do I know whether this is the full Alex Jones Show? I 20 don't know. 21 Q. Well, we know it's not, though; right? 22 Because Alex Jones' show isn't just an hour long; 23 right? 24 A. I don't -- I don't know -- 25 Q. Okay.</p>	<p>293</p> <p>1 copy of that? 2 A. It's in the videos that I watched. 3 Q. So there's a -- a witness who was there at 4 Sandy Hook that day; right? 5 A. He was interviewed by the media. 6 Q. Because here's the thing that I know about a 7 witness. I know about a witness who's on video who's 8 talking about a gentleman named Chris Mandefronia. 9 Chris Mandefronia is the Sandy Hook parent who came to 10 the school that day. He was actually there to help his 11 daughter with a gingerbread house project. 12 A. Yeah. 13 Q. And then he was arrested in the parking lot. 14 He wasn't in the woods or anything. 15 A. This is not the same thing. 16 Q. Okay. And Mr. Mandefronia was wearing camo 17 pants; right? 18 A. So -- 19 Q. And so what I'm wondering is, I'm trying to 20 figure out, because I -- I feel like after three years, 21 I know a lot about Sandy Hook coverage. And the idea 22 that there was a witness in the parking lot that day or 23 something who was talking to the news media and said 24 somebody was arrested in SWAT gear is totally new to 25 me.</p>



<p>294</p> <p>1 And so if that video exists, I want to try to 2 be able to figure out where it is. And so do you know 3 what -- was it in an episode that you saw that? 4 A. Yeah, so it's in one of these videos. I 5 don't know if it's in my clipped notes. I think 6 that -- that Alex did a -- he did a show that was 7 something to the effect of -- the title was New York 8 Times Makes Odd Claim or Baffling Claim About the 9 Second Shooter. 10 And it might have been in there. But he's 11 shown this clip a number of times on a variety of 12 different episodes. I've seen it multiple times on 13 multiple videos where he cuts to an interview done with 14 a person by a news organization who was there saying he 15 saw a guy get pulled out of the woods, he was wearing 16 camouflage pants, he was in handcuffs. 17 He's saying, it wasn't me, I didn't do it. 18 And they put him in the back of a police car. 19 Q. Okay. Hold on. Because now we're back to 20 camo pants. 21 A. Yes. 22 Q. All right. Not SWAT gear? 23 A. I think -- SWAT gear. You know what, let me 24 -- let me just think about what he said. 25 Q. Please do.</p>	<p>296</p> <p>1 say, somebody was arrested in SWAT gear. You would 2 agree with that? 3 A. No. I think that the video -- I think that 4 the question that he was asking was, I've seen these 5 sources say someone was pulled out of the woods and 6 someone was arrested. We've not heard anything about 7 this person. Why haven't we heard anything about this 8 person? 9 I think that there is a legitimate source -- 10 a question as to whether or not a person was pulled out 11 of the woods and why and who this person was, and that 12 was his question. 13 Q. It -- what -- do you -- I don't -- because I 14 don't recall a question. What I recall him saying, 15 I have it written down here, police found people in the 16 backwoods dressed up in SWAT gear. 17 A. That was one of the anomalies that he is 18 pointing to as why he was questioning the Sandy Hook 19 story. So he was pointing to the -- those sources. 20 Q. Right. That's not a question; right? That 21 is, here is an anomaly. This happened? 22 A. Yeah. Yeah. This is an anomaly. This is a, 23 you know, this is something that I think should be 24 answered. It's an anomaly. 25 Q. What's -- what needs to be -- we know the</p>
<p>295</p> <p>1 A. I'm not sure if he said SWAT gear or 2 camouflage pants. 3 Q. Okay. 4 A. But this is the -- that is the direct source 5 of that information. 6 Q. So it's very possible that Mr. Jones saw an 7 interview about Chris Mandefronia, a Sandy Hook parent 8 being briefly detained by police who happened to be 9 wearing pants that were camouflage, which is pretty 10 common in Sandy Hook area. 11 A. I don't -- you know what, I don't -- I don't 12 know. And the reason is because there is also the 13 reference to these -- these off-duty SWAT officer that 14 I had been seeing also in here who was never really 15 identified or he might have been identified and I just 16 don't know his name. 17 But -- so it may have been that as well. But 18 those two pieces of information in connection with his 19 interview, that's the source. 20 Q. It's also possible that Mr. Jones' claim 21 about somebody being dressed up in the woods in SWAT 22 gear is simply Mr. Jones conflating and confusing 23 mistakenly all these different separate ideas; right? 24 Mandefronia, the reporters in the woods, all of this 25 could just be conflated by Mr. Jones to just carelessly</p>	<p>297</p> <p>1 answer. 2 A. Who is the person in the woods that was taken 3 out of the woods? 4 Q. Got you. Okay. 5 A. Yes. 6 Q. So the question is, who is this man in SWAT 7 gear who was arrested? 8 A. Who is the person that was taken out of the 9 woods, yes. 10 Q. In SWAT gear; right? That's what you're 11 saying. 12 A. So like I said, I don't -- I -- I don't know 13 the exact quote on whether it was SWAT gear or 14 camouflage. But the interview with the person that he 15 was citing said one or the other, and I'm not sure. 16 Q. Well, see, here's the thing. When I deposed 17 Mr. Jones in the deposition you did read, there was a 18 big discussion of, do you think that somebody wearing 19 camo pants is SWAT gear. This was discussed at length 20 for a good period of that deposition how those two 21 things are not the same. And Mr. Jones agreed those 22 are not the same. 23 A. They're not the same, no. 24 Q. He's not talking about the guy in camo pants; 25 right? So I'm wondering --</p>

<p style="text-align: right;">298</p> <p>1 A. I don't know that he's not talking about the 2 guy in camo pants. So -- so quite similarly, and I've 3 seen this by Mr. Jones a couple of times. And this is 4 something that he -- that he tends to do, which is this 5 is not a scripted proceeding. This is something he's 6 just thinking out loud. It's coming out as the 7 thoughts are coming. 8 And sometimes, he's conflating certain 9 things. So, like, this is a perfect example of, did 10 Adam Lanza's house burn down, or was it bulldozed. So 11 these are something that is maybe not exactly what was 12 said. Maybe it wasn't SWAT gear, maybe it was 13 camouflage and it came out when he repeated it as SWAT 14 gear. 15 But that doesn't mean that the two things 16 he's talking about are different. He might have just 17 characterized it differently and it wasn't the same 18 term that was used. Does that -- does that make sense? 19 Q. Sort of. Did he ever correct himself? 20 A. On the issue of -- 21 Q. Saying that the police arrested somebody in 22 SWAT gear. 23 A. Did he ever make a correction as to whether 24 it was camouflage or SWAT gear? No, I don't think he 25 ever restated the camouflage versus SWAT gear issue.</p>	<p style="text-align: right;">300</p> <p>1 And I want to make sure -- 2 A. Stated what as fact? 3 Q. That -- I want to know the difference between 4 these two things if it is fact or -- 5 A. Sure. 6 Q. -- if there's just a report. You seem to 7 claim that Mr. Jones said that he saw reports of 8 someone saying that someone was arrested in the woods, 9 brought out in handcuffs from the woods; right? 10 A. Yes. 11 Q. In handcuffs and SWAT gear, pants or whatever 12 it is. Are you saying that that happened, or -- 13 A. That there was that witness? 14 Q. -- are you -- that -- no. That the company's 15 saying that that happened? Right. 16 A. I saw that video, yes. 17 Q. That that witness exists? Okay. Okay. I 18 just wanted to make sure that that's where we're at. 19 Okay. When you say that, you know, we're lawyers. We 20 know that words matter. Media organizations should 21 know that too, shouldn't they? 22 A. I think that the problem that the plaintiffs 23 have is that this is not a large media organization. 24 And I know you see that there's a lot of 25 disorganization, there's a lot of things that weren't</p>
<p style="text-align: right;">299</p> <p>1 Q. And the reason Mr. Jones might get things 2 wrong like that, saying that a parent in camo pants was 3 in SWAT gear or that a house that was bulldozed was 4 burned down is because he's not particularly careful 5 with the facts he puts on air. You'd agree with that? 6 A. I wouldn't say that he's not careful. I'm -- 7 like, I'm saying there's no teleprompter. It's not 8 previously scripted. He comes in in the morning and is 9 just talking. And these are his -- these are his 10 unfiltered opinions based on what he remembers or 11 recalls about certain things. 12 So, you know, you and I are lawyers. So, 13 obviously, we know words matter. And so we try to the 14 best of our efforts to use specific words by specific 15 people, but he's not an attorney. And so he's just off 16 the cuff saying what he remembers of that source. And 17 what he remembered of that source was, he remembered 18 somebody in SWAT gear. 19 It may have been instead camouflage pants, 20 but that doesn't change the fact that there was 21 somebody taken out of the woods on that particular day 22 in handcuffs that a witness saw. And that there was a 23 question about whether there was a second shooter. 24 Q. Okay. I want to make sure that I have you -- 25 because now, you've basically just stated that as fact.</p>	<p style="text-align: right;">301</p> <p>1 done probably as they should have been done. This was 2 a organization that was put together by someone who got 3 his start in, like, access, like, you know, as a -- as 4 a commentator. 5 He started out with, like, five people in an 6 office and then it's expanded. And I don't think he 7 ever knew how to do that appropriately. Like, I know a 8 lot of lawyers, for example, that really only want to 9 practice law and don't understand the business aspect 10 of practicing law. And so are really, really great 11 attorneys, but are really bad businesspeople. 12 And I think that's what you see here. I 13 think that this is a -- an -- an organization that grew 14 really quickly from a person who didn't have a lot of 15 savvy as to the business aspect of it and then found 16 that he had some issues that he had to take care of 17 later on. 18 Q. Well, I want to make a distinction between 19 the business aspect of it and the journalism aspect of 20 it. Mr. Jones was very savvy on the business aspect. 21 You'd agree with that? 22 A. No, I don't agree with that. 23 Q. Okay. Well, now you've got a man who, like 24 you say, started with five people at a public access. 25 And he created a media organization that's pulling in</p>

<p>302</p> <p>1 tens and millions of dollars in years of revenue. You</p> <p>2 -- you agree with that?</p> <p>3 A. I don't know if it's tens of millions of</p> <p>4 dollars, but he does pull in revenue from the sale of</p> <p>5 some -- of some products, yes.</p> <p>6 Q. Okay. Well, you read Ms. Karpova's</p> <p>7 deposition --</p> <p>8 A. Yes.</p> <p>9 Q. -- and so you understand that between 2018</p> <p>10 and 2016, the company generated 165 million dollars in</p> <p>11 revenue; right?</p> <p>12 A. Whether the revenue is based off of the --</p> <p>13 I'm sorry, what -- what was the number you said?</p> <p>14 Q. 165 million.</p> <p>15 A. Between what years?</p> <p>16 Q. 2016 and 2018.</p> <p>17 A. Let me just review what numbers.</p> <p>18 Q. I mean, we had the spreadsheets in front of</p> <p>19 her. That's what she testified to. I don't know what</p> <p>20 --</p> <p>21 A. Yeah, those were the -- I think that was the</p> <p>22 testimony based on our QuickBooks accounts; is that</p> <p>23 correct?</p> <p>24 Q. I don't think that was a QuickBooks account.</p> <p>25 A. I don't remember. But in any event, I think</p>	<p>304</p> <p>1 Q. Well, you just --</p> <p>2 A. 98 percent of what we do is commentary and is</p> <p>3 punditry and is basically a blogger type commenting on</p> <p>4 -- on other things we see. It is not journalism.</p> <p>5 Q. Okay. I mean, I'm having a problem because</p> <p>6 multiple people have testified to me that they do</p> <p>7 journalism. And now you're telling me that it's 98</p> <p>8 percent of the time they don't. Is that what you're</p> <p>9 saying?</p> <p>10 A. Actually, I've read a few of the depositions.</p> <p>11 In fact, I read Mr. Watson's deposition where he was</p> <p>12 quite clear that he was not a journalist.</p> <p>13 Q. That's an interesting one. Mr. Watson's a --</p> <p>14 super interesting. Because that one did -- that one</p> <p>15 surprised me too. Because Mr. Watson testified that</p> <p>16 Mr. Jones doesn't have journalistic ethics because he</p> <p>17 doesn't feel -- he doesn't feel he needs to abide by</p> <p>18 those ethics because he's not doing journalism. Would</p> <p>19 you agree with Mr. Watson's conclusion?</p> <p>20 A. I think that Mr. Watson, what he was saying</p> <p>21 was that because we do not practice journalism and</p> <p>22 we're commentating, that those rules don't really --</p> <p>23 aren't -- aren't something that they should be aware of</p> <p>24 or should be practicing just because we're not</p> <p>25 practicing journalism.</p>
<p>303</p> <p>1 that -- no, I don't agree that the business end of it</p> <p>2 is run particularly well, if that's the question.</p> <p>3 Q. Man, I'd hate to see one run poorly. Because</p> <p>4 that -- that sounds really good to me. I mean, I don't</p> <p>5 make that kind of money. But that does sound great to</p> <p>6 me. But --</p> <p>7 A. It sounds good on paper, but when you look to</p> <p>8 the nitty-gritty of it, that money is -- there is --</p> <p>9 there is not that kind of money there.</p> <p>10 Q. We'll talk about that tomorrow.</p> <p>11 A. Sure.</p> <p>12 Q. Let's put that -- a pin in that. You would</p> <p>13 agree with me, though, that for an organization that's</p> <p>14 generating that kind of revenue, Mr. Jones is not</p> <p>15 operating the journalism aspect of that business on a</p> <p>16 level commiserate with the responsibility that would be</p> <p>17 owed by a business that large and with that large of a</p> <p>18 viewership. You agree with that?</p> <p>19 A. No, because we're not practicing journalism.</p> <p>20 Q. See, Mr. Jones says he did; right? Like, you</p> <p>21 read his deposition. He says this is journalism.</p> <p>22 A. No. What he said was, I am a pundit. I am a</p> <p>23 commentator. And a vast majority of what we do is not</p> <p>24 journalism. I may do journalism sometimes. It's not</p> <p>25 mostly what we do.</p>	<p>305</p> <p>1 So I don't think it's accurate to say, oh,</p> <p>2 well, he doesn't think he should abide by these rules</p> <p>3 and these are rules he should be abiding by. I don't</p> <p>4 think that was an -- that's an accurate</p> <p>5 characterization of what Mr. Watson said.</p> <p>6 Q. Well, Mr. Watson directly testified InfoWars</p> <p>7 should be held to a lower standard because it's not a</p> <p>8 -- a -- I believe what he said, mainline journalism</p> <p>9 operation or middle of the road journalism operation.</p> <p>10 A. I don't think it's lower standards. I just</p> <p>11 think those particular journalistic standards don't</p> <p>12 apply.</p> <p>13 Q. Okay. So Mr. Jones doesn't have to be as</p> <p>14 careful as other media organizations because the nature</p> <p>15 of what he does isn't careful, it's punditry; right?</p> <p>16 A. It's punditry, yes.</p> <p>17 Q. Okay. When you say that he doesn't have to</p> <p>18 follow those rules, by rules, one of the things you're</p> <p>19 referring to is the sort of traditional checks and</p> <p>20 balances on truthfulness; right? That are found in</p> <p>21 journalism.</p> <p>22 A. I think if you're a journalist and you're</p> <p>23 doing an investigative reporting, you check your</p> <p>24 sources and vet your sources. I think that this -- the</p> <p>25 model, the business model of Free Speech is that they</p>

<p>306</p> <p>1 are -- they are relying on the source that they are 2 pulling from to vet their own sources. 3 Q. Okay. I get what you're saying. All right. 4 Let's go to paragraph 44. 5 A. Is this a good time to -- 6 Q. Yeah, Let's do it. 7 MS. BLOTT: Thank you. 8 THE VIDEOGRAPHER: 3:18 off. 9 (Recess from 3:18 p.m. to 3:33 p.m.) 10 THE VIDEOGRAPHER: We are on the 11 record at 3:33. 12 Q. (BY MR. BANKSTON) All right. I want you to 13 go now to paragraph 44 of that petition. 14 A. Sure. Okay. 15 Q. And that talks about a November 18th, 2016 16 video called Final Statement on Sandy Hook. 17 A. Okay. Let me just go there. I do recall 18 seeing that video. November -- what day did you say? 19 Q. 18. 20 A. 18? Okay. The date is just not in the 21 petition. Okay. Yes. 22 Q. Okay. So first of all, did you watch that 23 video? 24 A. Yes. 25 Q. Okay. So there's been some discussion, and</p>	<p>308</p> <p>1 there was an internal communication between the 2 Bloomberg people just in connection with that coalition 3 just telling his people to get ready for the next -- 4 whatever the next event is, because another event is 5 going to happen at some point. 6 And let's be ready to put forth our -- you 7 know, be ready to run with it when it happens. As far 8 as it being the day before, I -- or a representation 9 about the e-mail going out the day before, I don't see 10 that there's any way that that e-mail went out the day 11 before, or if it went out the day before. I don't know 12 when that e-mail went out. But that's what he's 13 referencing. 14 Q. Okay. So everything you just told me is just 15 what Mr. Jones told you? 16 A. Right. I've not ever laid eyes on such an 17 e-mail. I don't recall seeing any such thing in the 18 production. So based on my communications, that's what 19 it is. And it very well may be another example of, 20 like, for example, in Exhibit 10 where you're seeing 21 house burned down versus it was bulldozed. 22 There's this internal e-mail and he's 23 representing that it was the day before, when honestly, 24 I'm not really sure when it was or how -- how far in 25 relationship it was.</p>
<p>307</p> <p>1 me and Mr. Jones have talked about this in deposition 2 too, of a Bloomberg e-mail where Bloomberg allegedly 3 sent an e-mail the day before Sandy Hook telling his 4 people, get ready for the next 24 hours for a big 5 event. 6 A. Yes. 7 Q. I've been trying to figure out where that 8 comes from. Can you tell me? 9 A. So as best as I can see, but let me pull up 10 my handy-dandy notebook and I will tell you 11 specifically. All right. So MWUD. Okay. See, if I 12 hadn't run out of tabs, this would have been easier, so 13 I apologize. While I'm looking, just that particular 14 article or e-mail, so I think this is another -- as far 15 as I can determine, because I did try to look into the 16 source of that claim. 17 As far as I can tell, just based on my 18 interviews with -- oh, here it is. As far as I can 19 tell, based on the context of that statement and me 20 speaking to Mr. Jones, that e-mail or reference to an 21 e-mail is based on -- Mayor Bloomberg at the time was 22 in this kind of coalition of other mayors that were for 23 gun control, so to speak. 24 I believe the Aurora shooting was very close 25 in time to the Sandy Hook shooting. And essentially,</p>	<p>309</p> <p>1 Q. You don't even know there was an e-mail? 2 A. I don't know where he saw that, no. I don't 3 see the document that he sourced. 4 Q. You don't have anything else to give me other 5 than basically what Mr. Jones said on the show; right? 6 Same stuff. 7 A. As far as that particular claim, yes. 8 Q. Yeah. Mr. Jones had told me he could find 9 this for me. 10 A. I have not been able to locate anything like 11 that. 12 Q. Okay. What did you do to try? 13 A. I asked Mr. Jones, I have spoken to other 14 people, like I said earlier, the other employees that I 15 spoke to. And I've looked through the documents that 16 have been produced. 17 Q. Did you read the article Aaron Dykes wrote 18 about this? 19 A. I may have, in all -- all honesty. I read a 20 lot of documents. 21 Q. All right. Well, because, I mean, at one 22 point in Mr. Jones discussing this whole thing, he puts 23 up an article on InfoWars which I don't have, which 24 isn't available anymore. 25 A. Okay.</p>

<p>310</p> <p>1 Q. But it's an article about -- from Aaron Dykes 2 and apparently talking about this Bloomberg stuff. And 3 I -- I'm wondering if that's -- didn't get into your 4 notes somehow. 5 A. If I may just look at my notes. 6 Q. Sure. 7 A. So no, I don't have anything like that in my 8 notes. But I do recall him mentioning a Bloomberg 9 e-mail. At various points, he has termed that e-mail 10 as the day before. Sometimes, he's said a different 11 time period. But as far as that particular e-mail 12 goes, I don't have a copy of it. 13 Q. When you just said he, you're referring to 14 Mr. Jones, not Mr. Dykes? 15 A. Right. 16 Q. Okay. You understand who Aaron Dykes is; 17 right? 18 A. Yes, but I have not spoken to Mr. Dykes. 19 Q. Okay. That's -- well, I mean, that's one of 20 the things I wanted to ask you about. Mr. Dykes, 21 during a substantial period of Sandy Hook coverage, was 22 one of the primary writers at InfoWars; right? 23 A. He was a writer. I don't know if he was a 24 primary writer. 25 Q. Okay.</p>	<p>312</p> <p>1 time period who had supervisory positions too; right? 2 A. In other departments? 3 Q. In writing. 4 A. As far as I know, Kurt Nimmo was the one that 5 was in the supervisory position in this time period. 6 Q. Okay. 7 A. He left around 2018, at which point Kit -- 8 Kit Daniels became the person in that supervisory 9 position. 10 Q. Well, you remember Kit Daniels testifying 11 that Mikael Thalen was the person in charge of fact 12 checking at InfoWars from 2014 to 2018? 13 A. Fact checking? 14 Q. Uh-huh. He was the editor. The guy -- the 15 supervising editor who checked other writers' work. 16 A. There -- we -- so fact checking, I don't -- I 17 don't agree with that. 18 Q. Okay. 19 A. So I don't know if that's what he said, but 20 -- but there is nobody that checks facts like that. So 21 essentially, during this time period as well as now 22 currently, the rule of -- the general rule is to make 23 sure that your article has more than one source. So 24 there is checking of the articles to make sure that 25 they're appropriately backed, but I don't want to say</p>
<p>311</p> <p>1 A. He -- I don't think he was in a supervisory 2 position, if that's the question. 3 Q. InfoWars doesn't have titles. 4 A. They don't have titles, but that doesn't mean 5 there's not a person that's in a supervisory position. 6 Like, Kurt Nimmo was in a supervisory writer position 7 in that time period. 8 Q. Okay. And you don't think Aaron Dykes was? 9 A. I don't think so. 10 Q. Okay. 11 A. I think in that time period, Kurt Nimmo was 12 the -- in that supervisory position. 13 Q. What makes you -- what makes you -- who did 14 you talk to about Aaron Dykes? 15 A. What do you mean, talk to -- 16 Q. Well, I mean, you had to come up -- you 17 didn't -- before this deposition, you didn't know Aaron 18 Dykes from anybody on the street. And now you're 19 telling me he's not a supervisory person. So who did 20 you talk to about Aaron Dykes? 21 A. When I talked to -- I didn't talk to anybody 22 about Aaron Dykes. I talked to people about who was in 23 a supervisory position during that time period, and I 24 was informed it was Kurt Nimmo. 25 Q. Well, there were other people during that</p>	<p>313</p> <p>1 that they are fact checked by anybody. 2 So, for example, now, my conversation based 3 on Kit Daniels' interview with him is basically, they 4 write the articles in WordPress and the supervisor, 5 whoever that is, does have access to review that 6 material prior to. But as far as, quote, fact 7 checking, I don't think that they're doing that. I 8 think they're doing it to make sure that the article is 9 appropriately sourced, but they're not necessarily fact 10 checking. 11 Q. Okay. You know who Melissa Melton is; right? 12 A. I'm sorry, I don't. 13 Q. That's Aaron Dykes' wife. She was also a 14 writer at InfoWars during this time. 15 A. Okay. 16 Q. I mean, in other words, what I'm saying is 17 Aaron and Melissa are the source of a lot of the early 18 Sandy Hook stuff; right? 19 A. The early Sandy Hook Stuff? 20 Q. Yeah. 21 A. How early are you talking? 22 Q. Well, I mean, let's go ahead and just -- from 23 the day of Sandy Hook till about -- let's go ahead and 24 do it from the day of Sandy Hook till about two years 25 out. You would agree that Melissa Melton and Aaron</p>

<p>314</p> <p>1 Dykes were a source for a significant amount of that 2 material? 3 A. I don't -- I don't think so. You mean -- so 4 here's my -- here's my concern and here's what I -- 5 what I think is that a lot of this material, like I 6 said, is just reposting of other articles that are 7 already out there; right? So sure, there are articles 8 on Sandy Hook that they were, like, you know, 9 resourcing on a daily basis. 10 So at any given day, the writers are putting 11 out dozens of articles a day. And most of those 12 articles, like we've said, are not original content. 13 Most of those articles are, I saw another article in 14 CNN. I saw another article on Drudge. I saw this 15 article. And then resummarizing it, maybe putting our 16 spin on it or our opinion in there. 17 But ultimately, it's a report on another 18 article. So if she was -- Melissa was doing that 19 between when Sandy Hook happened and 2015 or 2016, 20 sure. I'm sure that's -- she was one of the writers. 21 If she's one of the writers, that's what she would have 22 been doing. 23 Q. Okay. So Aaron Dykes, Melissa Melton, two 24 people you haven't spoken to; right? 25 A. I have not spoken to them, no.</p>	<p>316</p> <p>1 Okay. So in this particular video, there appears to be 2 -- there's a bunch of claims made in this -- in this 3 video. 4 Q. Indeed. 5 A. One of which appears to be that the school 6 was shut down. And again, he shows the website to that 7 school and its traffic from 2008 to 2013 and then cites 8 the Wayback Machine. 9 Q. No, I know that happens -- 10 A. Right. 11 Q. -- and the point in the video is that the 12 school has no Internet traffic. 13 A. Yes. 14 Q. I'm talking about later in the video, 15 Mr. Jones says, and that school was shut down, that's 16 what the records show. 17 A. That's what the record he is referring to is 18 the Wayback Machine. 19 Q. Well, he refers to in other -- in other 20 videos that we're going to talk about, he refers to 21 e-mails between the school board and the school showing 22 that the school was shut down. Those are the records; 23 right? 24 A. I don't know that from this video. That's 25 not in this video.</p>
<p>315</p> <p>1 Q. Mikael -- Mikael Thalen, you haven't spoken 2 to him either? 3 A. No. 4 Q. Okay. Let's talk about in that article -- I 5 mean, in that video in paragraph 44, the statement that 6 the school was shut down, that's what the records show. 7 What records are being referred to there? 8 A. I'm sorry, which paragraph are you referring 9 to? 10 Q. I'm referring to the -- the final statement 11 on Sandy Hook, which is paragraph 44. 12 A. Right. 13 Q. It's a November 18th, 2016 video. One of the 14 statements of fact in there was the school was shut 15 down, that's what the records show. What are the 16 records that he's talking about? 17 A. Which allegation -- which paragraph is that 18 allegation in? 19 Q. It's -- I'm not even positive it's in the 20 petition. 21 A. Well, that's -- that's what I'm asking, 22 sorry. I don't know that that is -- is made in the -- 23 in that video. But -- 24 Q. Okay. 25 A. -- I will review my notes and we will see.</p>	<p>317</p> <p>1 Q. Okay. Well, I guess we'll have to get to it 2 when we get to that in another video. 3 A. Right. 4 Q. The other one is the -- the infamous video 5 that Mr. Jones shows of kids going around in circles 6 around the building. You know a video I'm talking 7 about? 8 A. I believe it's -- mostly what he's referring 9 to is some photographs. But I think there is a video 10 of kids in a parking lot that he refers to a few times. 11 There are a couple of photographs. 12 Q. The parking lot, not of the school? 13 A. I don't know where it is. And I think 14 Mr. Jones says that, is that he -- 15 Q. Well, that's what I wanted to know. 16 A. Right. I don't think Mr. Jones knew if it 17 was at the school or if it was another location. 18 Because I know there was an issue about the firehouse 19 as well. 20 Q. Yeah. Well, he said it was the school. We 21 know that; right? 22 A. I think he believed it was the school. 23 Q. Right. Okay. So that video and that 24 allegation that there were kids going around in circles 25 around the building, where did he get that video?</p>

<p>318</p> <p>1 Where did he get that allegation?</p> <p>2 A. From that video that he saw.</p> <p>3 Q. Right. That's what I'm saying, where does</p> <p>4 that video come from?</p> <p>5 A. That's a video that he would have found on</p> <p>6 the news. That was --</p> <p>7 Q. No.</p> <p>8 A. -- reported in the news -- in the news</p> <p>9 cycle --</p> <p>10 Q. No, ma'am.</p> <p>11 A. -- around that particular time. So that's</p> <p>12 his opinion based on what he was seeing. So if he's</p> <p>13 seeing this video and he thinks it looks like kids are</p> <p>14 walking around in circles, that's his opinion.</p> <p>15 Q. All right. I'm having a bit of the same</p> <p>16 struggle I'm having with Ms. Karpova's deposition,</p> <p>17 which is that -- that like any good lawyer, I come into</p> <p>18 this case and there's -- there's -- honestly, there's a</p> <p>19 lot of things I don't know. There are a lot of things</p> <p>20 I don't know. More than average on a case that I don't</p> <p>21 know. But there are a lot of things I do know. All</p> <p>22 right?</p> <p>23 And one of those things is that that video</p> <p>24 did not come from the news media. All right? That</p> <p>25 video is -- I think you saw in that video is very</p>	<p>320</p> <p>1 originally, so I can't say. So it could be the same</p> <p>2 thing as the Drudge Report, you know. So the Drudge</p> <p>3 Report had that edited -- edited video of -- of</p> <p>4 Dr. Carver's interview. I don't know if it came from</p> <p>5 somewhere like that. I don't know where the -- where</p> <p>6 he saw this video or if he saw it edited or -- I just</p> <p>7 don't know.</p> <p>8 Q. All right. Let me just stop for a second.</p> <p>9 Because you said that Drudge Report had an edited copy</p> <p>10 of the video.</p> <p>11 A. Oh, no. Is it Drudge -- Zero Point Now, I'm</p> <p>12 sorry.</p> <p>13 Q. Okay.</p> <p>14 A. Zero Now.</p> <p>15 Q. Okay.</p> <p>16 MR. OGDEN: Zero Hedge.</p> <p>17 A. I meant Zero Hedge. My mistake.</p> <p>18 Q. (BY MR. BANKSTON) Okay. For this video, The</p> <p>19 Final Statement on Sandy Hook, can you tell me what</p> <p>20 employees were involved in making, researching,</p> <p>21 producing this video?</p> <p>22 A. Well, as far as making and researching it,</p> <p>23 Mr. Jones researched this video. So his position -- so</p> <p>24 let me just see in my notes. Final Statement on Sandy</p> <p>25 Hook. Okay. So based on my conversations, it was</p>
<p>319</p> <p>1 edited because it starts having the people go back,</p> <p>2 forward, back, forward, back, forward. All right? And</p> <p>3 then it says in titles on the video, going in circles.</p> <p>4 All right? Somebody made that video.</p> <p>5 A. Somebody edited the video.</p> <p>6 Q. Yeah. Somebody --</p> <p>7 A. I don't know the answer to that.</p> <p>8 Q. Right. There's a source of this. Somebody</p> <p>9 took a piece of footage that they saw and edited and</p> <p>10 tried to make it seem like this was supporting the</p> <p>11 conspiracy of Sandy Hook. And then Mr. Jones or</p> <p>12 somebody at InfoWars saw that and started using that on</p> <p>13 their show. I want to know where it comes from.</p> <p>14 A. I don't know the answer to that.</p> <p>15 Q. Okay. And as far as trying to hunt down that</p> <p>16 video, you didn't do anything to try to hunt down where</p> <p>17 that allegation comes from?</p> <p>18 A. As far as I know, Mr. Jones saw a video and</p> <p>19 that was -- he -- what he was basing his opinion on.</p> <p>20 If he saw the edited version of the video and that's</p> <p>21 why he was basing his opinion on it, I don't know. But</p> <p>22 I don't know where the edited version came from.</p> <p>23 Q. Right. We know it didn't come from the news,</p> <p>24 though?</p> <p>25 A. I don't know where it -- where he saw it</p>	<p>321</p> <p>1 researched by Rob Dew and Mr. Jones.</p> <p>2 But as we discussed earlier, as far as</p> <p>3 researching the videos, the hosts research the content</p> <p>4 for the videos and the producers don't have say in the</p> <p>5 content of the videos. So, I mean, I could check the</p> <p>6 document that we produced earlier as far as whether</p> <p>7 Melinda did her research for who was working that day.</p> <p>8 But again --</p> <p>9 Q. Okay.</p> <p>10 A. -- these are not the people that would have</p> <p>11 been involved in the content.</p> <p>12 Q. Well, here's my problem. I know that you</p> <p>13 don't know --</p> <p>14 A. It's not on this.</p> <p>15 Q. Okay. So there's -- you don't have a list of</p> <p>16 employees who were involved in the video?</p> <p>17 A. For that -- for that day, no.</p> <p>18 Q. Okay. So if I wanted to know every employee</p> <p>19 who was involved in that video and what their specific</p> <p>20 roles is, that's something you can't tell me?</p> <p>21 A. No.</p> <p>22 Q. Okay. In terms of all of the -- who edited,</p> <p>23 who created the screenshots, who put all the stuff</p> <p>24 together that went up on the screen in front of</p> <p>25 Mr. Jones, we don't know that?</p>

<p style="text-align: right;">322</p> <p>1 A. Well, Mr. Jones, there was the video clip --</p> <p>2 so in that particular video, he had put up on the</p> <p>3 screen the video clip of the witness regarding the</p> <p>4 second shooter. So I know that there was a question</p> <p>5 you had asked earlier where this video from this</p> <p>6 witness was. So this is shown in that video.</p> <p>7 Q. Okay. I'll go check that.</p> <p>8 A. Then, there's a CBS news clip of John -- from</p> <p>9 John Miller reporting for CBS regarding the second</p> <p>10 shooter. So there was a CBS broadcast stating second</p> <p>11 shooter, he put that on the screen. There was a clip</p> <p>12 of Obama giving a press conference after Sandy Hook</p> <p>13 because he has this claim about fake crying and Obama</p> <p>14 was fake crying regarding the children.</p> <p>15 So he put up the clip of Obama's press</p> <p>16 conference. He put up the clip of Robbie Parker. He</p> <p>17 put up the clip of Lieutenant Vance regarding</p> <p>18 misinformation. He put up some clips from the FOIA</p> <p>19 hearing. He put up the Wayback Machine.</p> <p>20 Q. Okay. Mr. --</p> <p>21 A. He put up a lot of clips.</p> <p>22 Q. Mr. Jones didn't put up any clips? He</p> <p>23 doesn't actually do that?</p> <p>24 A. No, the producer.</p> <p>25 Q. Right.</p>	<p style="text-align: right;">324</p> <p>1 A. Right. I don't think she was the one.</p> <p>2 Q. Okay. All right. Well, let's go on to the</p> <p>3 next video. Let's go to paragraph 38.</p> <p>4 A. Sure.</p> <p>5 Q. You see the video there from July 7th, 2015</p> <p>6 entitled Government is Manufacturing Crises; right?</p> <p>7 A. Okay. Let me just go to my July 7th.</p> <p>8 Q. I believe you're going to find two different</p> <p>9 videos on July 7th. Let me know which one you're</p> <p>10 referring to.</p> <p>11 A. So I have -- I have the video Retired FBI</p> <p>12 Agent Investigates Sandy Hook Mega Massive Cover-up.</p> <p>13 Q. That's the next paragraph. We'll talk about</p> <p>14 that.</p> <p>15 A. Right. But I don't have in my chart the one</p> <p>16 before that.</p> <p>17 Q. Okay. So the -- the video that's identified</p> <p>18 in plaintiffs' petition called Government is</p> <p>19 Manufacturing Crises, you haven't watched that?</p> <p>20 A. I don't -- no, I don't have it on my list.</p> <p>21 So no, I didn't watch it.</p> <p>22 Q. Okay. So as far as the claims made in that</p> <p>23 video, if there are any claims that are in that video</p> <p>24 that are there unique to that video, you can't speak</p> <p>25 about them today; right?</p>
<p style="text-align: right;">323</p> <p>1 A. So like we -- yeah. So like we -- like we</p> <p>2 discussed earlier, he would tell his producers, I have</p> <p>3 clips for this. Go find it. And so Mr. Jones would be</p> <p>4 responsible for saying, I want these clips.</p> <p>5 Q. Right.</p> <p>6 A. And they would just pull them.</p> <p>7 Q. That's what I want to know.</p> <p>8 A. Right.</p> <p>9 Q. Right? Is because I don't know where that</p> <p>10 thing comes from, the kids going around in circles. I</p> <p>11 want to find out --</p> <p>12 A. Oh, I don't know where -- like I -- like I</p> <p>13 said earlier, I don't know where that originated from.</p> <p>14 Q. I know you don't.</p> <p>15 A. Right.</p> <p>16 Q. So it's not useful to talk to you. I want to</p> <p>17 know who I should be talking to. Who is the producer?</p> <p>18 A. The producer for that?</p> <p>19 Q. Uh-huh.</p> <p>20 A. I -- honestly, I don't have that. Let me</p> <p>21 see. So for that day, it would have been in 2016. I</p> <p>22 mean, Daria would have been there during that time</p> <p>23 period.</p> <p>24 Q. Well, we know from her testimony that she</p> <p>25 wasn't the one; right?</p>	<p style="text-align: right;">325</p> <p>1 A. No.</p> <p>2 Q. Okay.</p> <p>3 A. But I can -- I can talk about the other one.</p> <p>4 Q. Honestly, if you -- let's just stick with</p> <p>5 this video.</p> <p>6 A. Sure.</p> <p>7 Q. Right? There's no point in asking you any</p> <p>8 questions about this video. You didn't even watch it.</p> <p>9 A. I didn't watch that particular video, no.</p> <p>10 Q. Let's move on to the next one. Paragraph 39,</p> <p>11 you do -- you say you do have a copy of this video,</p> <p>12 July 7th, 2015 Retired FBI Agent Investigates Sandy</p> <p>13 Hook Mega Massive Cover-up?</p> <p>14 A. Yes.</p> <p>15 Q. Who is the retired FBI agent?</p> <p>16 A. Rob Dew's uncle.</p> <p>17 Q. Did you talk to him?</p> <p>18 A. No.</p> <p>19 Q. Did you try to talk to him?</p> <p>20 A. No.</p> <p>21 Q. Okay. It says the ambulances came half an</p> <p>22 hour later. Do you have a source on that?</p> <p>23 A. Let me just pull up my notes on that.</p> <p>24 Q. And I'm going to ask you for the deposition</p> <p>25 tomorrow, if you could make sure -- I'll give you some</p>



<p>326</p> <p>1 tabs if you need. You can tab up everything that 2 you're going to be using tomorrow. 3 A. Thanks. 4 Q. Just so we can maybe get you on your flight. 5 A. Sorry, I don't have a printer at the hotel. 6 So I was relying on some other people to print it out 7 for me and didn't have enough tabs. Here we go. Okay. 8 I'm sorry, what was your question? 9 Q. I don't even remember. Ambulance came half 10 an hour later. What's the source on that? 11 A. So according to my notes, this is a -- this 12 is a broadcast that Rob Dew and Alex Jones were talking 13 about the FOIA hearings. 14 Q. Uh-huh. 15 A. And they go through Halbig's 16 questions and 16 why the official story doesn't add up. So these are 17 one of Halbig's 16 questions. 18 Q. The ambulances came an hour and a half later 19 is one of Halbig's 16 questions, that's your testimony? 20 A. It's -- well, like I -- like we talked about, 21 they've expanded over time. Sometimes, there's 22 20-something questions. It started out as 16 23 questions, but he's expanded those over time. 24 Q. So if I go and I look through Halbig's stuff, 25 I will find him somewhere saying the ambulances came</p>	<p>328</p> <p>1 hearings, yes. 2 Q. One of the things that Mr. Bidondi told the 3 company in his reportings is that Mr. Halbig was able 4 to prove that DHS approved this sign-in sign and put it 5 out in front of Sandy Hook; right? 6 A. That's -- no, that's not what he said. He 7 said at the second FOIA hearing, what came out at the 8 FOIA hearing was that the town does not have any 9 records relating to this sign. And then the questions 10 were, how could it be, where did the sign come from. 11 And then the town disclosed that they believe that the 12 Department of Homeland Security had ordered that sign 13 and that's why they had no records. 14 Q. Right. That's -- 15 A. So that's where the origin of that statement 16 came from. 17 Q. Right. So that's not -- that's not something 18 that came out of Wolfgang Halbig's 16 points, that's 19 something that came out of the FOIA meeting that he 20 participated in? 21 A. That DHS ordered that -- that -- 22 Q. Sure. 23 A. -- sign? Yes, that came from the FOIA 24 hearings. 25 Q. Right. And that was reported to InfoWars by</p>
<p>327</p> <p>1 half an hour -- an hour and a half later? 2 A. I think what he says is, the ambulances were 3 not allowed through, that there was -- it was blocked 4 and that the ambulances were not allowed up to the 5 school. So I think that was his conversation regarding 6 the ambulances. 7 Q. Okay. When they say DHF, an hour and a half 8 later with the time stamp, said put -- put up signs 9 saying sign-in here, that's from Mr. Bidondi going up 10 to that hearing and reporting on it; right? 11 A. No, that -- that's originally from 12 Mr. Halbig. So Mr. Halbig produces this photograph and 13 says, where did this sign come from? And made a 14 representation that it was taken an hour and a half 15 after the shooting. And then he submitted some FOIA 16 record requests to the town as to where the sign came 17 from. So again, this is another one of Mr. Halbig's 16 18 questions. 19 Q. Right. Well, what I'm saying is Dan Bidondi 20 went to -- to Connecticut with Mr. Halbig. You 21 understand that? 22 A. He went to the FOIA hearings, yes. 23 Q. Right. And did reporting on the ground from 24 the FOIA hearings. 25 A. He covered -- yeah, he covered the FOIA</p>	<p>329</p> <p>1 Dan Bidondi? 2 A. Yes. He videoed it. 3 Q. Okay. Right. And Dan Bidondi covered -- is 4 -- multiple times went up there with Wolfgang Halbig to 5 Connecticut; right? 6 A. Well, he -- he lives up there. He lives -- I 7 want to say in Rhode Island or something. He doesn't 8 live very far. He doesn't live here. But yes, he did 9 go there with Wolfgang Halbig. 10 Q. That's all I'm asking. He went to multiple 11 trips -- 12 A. Yes. 13 Q. -- to -- and I know you want to try to say, 14 well, look. It wasn't that big of a deal because he 15 lives right next door to there. And I know you throw 16 in little advocacy like that. But I'm just trying to 17 ask you simple questions. 18 And I'm going to tell you, if you want to 19 make that plane flight, those kind of answers are not 20 going to help you. I'm just trying to help you out 21 because you want to make that plane flight. 22 A. I'm sorry, are you -- are you -- are you 23 threatening to -- 24 Q. No, I'm saying this takes longer time. This 25 takes more time, when you add in an answer to a</p>

Paz, Brittany

<p>330</p> <p>1 question that I'm not asking. When all I'm asking, the 2 very simple thing I'm asking is, did Dan Bidondi go 3 multiple times to Newtown. 4 A. He did. 5 Q. And you start going off to me about, well, 6 yeah, you know, he lives near there and all this sort 7 of stuff. I -- you know I don't care that Dan Bidondi 8 lives near Newtown. All I'm trying to confirm is a 9 very simple fact so I can have it for the record. Did 10 Dan Bidondi go multiple times to Newtown? 11 A. Yeah. I think -- 12 Q. I'm not threatening you in any way. All I'm 13 trying -- 14 A. I think he went two or three times, yes. 15 Q. All I'm trying to communicate to you is the 16 more times we have answers that don't match up to what 17 we're talking about, talking about Leonard Pozner's 18 ex-wife and what she believes and things like -- any 19 time we do that is time that I would not otherwise be 20 spending with you. 21 And I just want you to understand that we're 22 on the same page that way because I do want to get you 23 on that flight. I don't want to be the reason that 24 you're not on that flight. And so that's what I'm 25 trying to tell you right now. And I -- I promise you,</p>	<p>332</p> <p>1 you were going to talk to him? 2 A. No, it's not. Yeah. 3 Q. Okay. Again. This is the video I wanted to 4 put a pin in earlier. This is a video where Mr. Jones 5 said, we have the e-mails from the city council back 6 and forth and the school talking about it being shut 7 down a year before. What is he talking about? 8 A. Is this the video -- are we still on the same 9 video? 10 Q. Uh-huh. On paragraph 39. Uh-huh. 11 A. Okay. So here -- and I think this is another 12 example of the characterization of -- of a certain 13 piece of information. So I think that what he's 14 referring to here is also specifically one of Halbig's 15 claims that Mr. Halbig has some e-mails that are not 16 necessarily confirming that the school was closed, but 17 e-mails relating to the condition of the school and his 18 request -- requests in connection with the condition of 19 the school because certain reports have to be generated 20 by certain times. 21 And in his opinion, those documents show that 22 the school wasn't functional because those reports were 23 not produced by the school or by the town. 24 Q. Okay. This is what you think? 25 A. That -- that's what it appears to be</p>
<p>331</p> <p>1 because I know that came out of your mouth, it is not 2 in any way a threat to you. I really do want that to 3 happen because I don't want to be here late tomorrow. 4 I -- believe me, I got better places to be. 5 When Dan Bidondi, who's done multiple reports 6 with Wolfgang Halbig from Newtown reporting on that FOA 7 process that has made it into InfoWars videos, have you 8 spoken to Dan Bidondi at any point? 9 A. No. 10 Q. Did you try to speak to Dan Bidondi? 11 A. No. He doesn't work for the company. 12 Q. Okay. Is that -- is that the reason you 13 didn't speak to him, because he doesn't work for the 14 company? 15 A. No, that's not the reason. But he doesn't 16 work for the company and he doesn't -- I don't think 17 he's associated anymore with the company. 18 Q. You spoke to Nico? 19 A. I did. 20 Q. Okay. I just want to make sure Nico doesn't 21 work for the company. 22 A. Not anymore, no. 23 Q. So the idea of whether or not Dan Bidondi 24 works for the company is irrelevant to whether you 25 talked to him; right? That isn't what decided whether</p>	<p>333</p> <p>1 referencing in here. But again, it's -- it is not 2 e-mails confirming that the school was shut down. 3 Q. You've never -- you don't even know if 4 there's e-mails. Have you seen these e-mails? 5 A. I've seen discussions from Mr. Halbig -- 6 wait. Let me just go back. So Mr. Halbig requested -- 7 put in a bunch of FOIA requests. Some of those FOIA 8 requests included requests that are in connection with 9 an environmental study done at the school. 10 Those environmental studies, in his research 11 opinion, estimation, based on his research of the legal 12 regulations up there, is that those records need to be 13 produced within a certain period of time. And the fact 14 that the school did not have any such records 15 responsive to that request show the school was not in 16 operation. 17 Again, that isn't the same thing as there's 18 e-mails being back and forth. And I agree with you, 19 I've not seen any such e-mails. But I think that it's 20 relating to those FOIA requests. 21 Q. That is the inference you've been able to 22 make -- 23 A. Yes. 24 Q. -- just by what you think you know about 25 Mr. Halbig and what his claims were; right?</p>

<p>334</p> <p>1 A. Not just about that claim, but about the</p> <p>2 things that Mr. Jones is saying in this video.</p> <p>3 Q. Okay. And so you were able to arrive at that</p> <p>4 inference?</p> <p>5 A. Right.</p> <p>6 Q. Without ever having to see the e-mails or</p> <p>7 anything like that, that's -- you can arrive --</p> <p>8 A. I -- I -- I'm not in possession of any such</p> <p>9 e-mail like that.</p> <p>10 Q. Got you.</p> <p>11 A. I have not reviewed any -- seen any e-mails</p> <p>12 in the production like that.</p> <p>13 Q. Okay. And you didn't talk to Mr. Halbig;</p> <p>14 right?</p> <p>15 A. No.</p> <p>16 Q. Okay. Let's talk about paragraph 36. March</p> <p>17 4th, 2015. Do you see that?</p> <p>18 A. Yes.</p> <p>19 Q. New Bombshell Information Sandy Hook</p> <p>20 Information Inbound.</p> <p>21 A. Yes.</p> <p>22 Q. We've talked a little bit about this video</p> <p>23 before. So we already know the guest was Wolfgang</p> <p>24 Halbig.</p> <p>25 A. Yes.</p>	<p>336</p> <p>1 then there's another article, InfoWars article, Shooter</p> <p>2 James Holmes and DARPA Weird Science. Then there's</p> <p>3 some cuts to news footage about the man in the woods.</p> <p>4 And then most of the sourcing here are things that</p> <p>5 are -- Halbig is saying.</p> <p>6 Q. Okay. So first of all, of all those</p> <p>7 documents you just listed off to me, you reviewed all</p> <p>8 those documents?</p> <p>9 A. Have I read each and every one of these</p> <p>10 articles? I'm -- I'm not sure that I've read each and</p> <p>11 every article.</p> <p>12 Q. All right. That's -- that was what my</p> <p>13 question is.</p> <p>14 A. Sure.</p> <p>15 Q. Because I don't -- I -- I know you wanted to</p> <p>16 tell me what was sourced and all of this sort of stuff,</p> <p>17 different question. I just want to know what</p> <p>18 documents, physical documents relating to this video</p> <p>19 you've reviewed.</p> <p>20 A. Okay. In all honesty, I don't know whether I</p> <p>21 reviewed all -- I read each and every source.</p> <p>22 Q. Okay. And you certainly didn't contact each</p> <p>23 and every source; right?</p> <p>24 A. No.</p> <p>25 Q. Okay. And then there -- a lot of these</p>
<p>335</p> <p>1 Q. You've watched this video?</p> <p>2 A. Yes.</p> <p>3 Q. Have not spoken to Mr. Halbig?</p> <p>4 A. No.</p> <p>5 Q. Okay. Have you reviewed documents about the</p> <p>6 sourcing of this video?</p> <p>7 A. Yes. Let me just -- okay. Here we go. Oh,</p> <p>8 yeah. This is the -- I think we already talked about</p> <p>9 this video.</p> <p>10 Q. We have talked about it a little bit. I'm</p> <p>11 wondering what documents you've reviewed to about the</p> <p>12 sourcing of this video.</p> <p>13 A. Okay. Sourcing of this video. So --</p> <p>14 Q. Yeah. What -- not -- I don't want to know</p> <p>15 the source of different claims. I want to know first</p> <p>16 what documents did you review about the sourcing of</p> <p>17 this video?</p> <p>18 A. So the sources that are specifically cited in</p> <p>19 this video, there's a couple of -- well, first, there</p> <p>20 is Mr. Halbig's website. He posts up there.</p> <p>21 Sandyhookjustice.com. Then there's an article on</p> <p>22 InfoWars, Nation All Over the World Admit to False Flag</p> <p>23 Terrorism.</p> <p>24 Then there's another article, Six-year-old</p> <p>25 Child Suspended for Making Gun Shape With Hand. The --</p>	<p>337</p> <p>1 claims come from Wolfgang Halbig; right?</p> <p>2 A. Right.</p> <p>3 Q. Do you -- have you reviewed any documents</p> <p>4 about the booking process for Wolfgang Halbig for this</p> <p>5 particular show?</p> <p>6 A. You mean how -- how was he -- how did he come</p> <p>7 to be on the show that particular day?</p> <p>8 Q. And -- and what materials did he provide the</p> <p>9 company prior to his booking to -- about this booking,</p> <p>10 anything like that?</p> <p>11 A. So -- okay. So -- and that's a good</p> <p>12 question. So I did do interviews with -- with Nico</p> <p>13 about how -- when clients are -- not clients, but</p> <p>14 guests are booked on the air, the procedure by that --</p> <p>15 which that happens and whether after that, anything</p> <p>16 else subsequently happens as far as resourcing their</p> <p>17 material.</p> <p>18 So usually how the process goes is the person</p> <p>19 -- host, I should say, will go and say, I want to bring</p> <p>20 this particular person on. And then Nico or whomever</p> <p>21 the person in charge there is will pull some</p> <p>22 information about the person just to basically verify</p> <p>23 this person is the person they say they are.</p> <p>24 Because they do have people that pretend to</p> <p>25 be other people, aren't real people. There's fake</p>

<p>338</p> <p>1 Facebook pages, I mean, you know how that goes. So</p> <p>2 they will pull some information off the Internet to</p> <p>3 just verify this person is, in fact, who he says he is.</p> <p>4 Provide that to the host.</p> <p>5 The host will make their own determination as</p> <p>6 to whether they want this person on the air or not.</p> <p>7 And then the -- the person will just be booked. So</p> <p>8 Nico essentially was just the liaison.</p> <p>9 Q. Okay.</p> <p>10 A. As far as how Mr. Halbig came to become a</p> <p>11 guest, essentially, Mr. Salazar wrote that article in</p> <p>12 early 2014. It was an article about Mr. Halbig being,</p> <p>13 quote, unquote, threatened by the police. And that</p> <p>14 came to the attention of Mr. Knight. Mr. Knight</p> <p>15 reached out to Nico to say, I want to book this person.</p> <p>16 At the time, Mr. Knight had the authority to</p> <p>17 book his own -- his own guests. Now, that's not the</p> <p>18 case. Well, he's not there anymore. But now that's</p> <p>19 not the case. And so Nico proceeded to just pull some</p> <p>20 basic information about his website, about Mr. Halbig's</p> <p>21 website, so that it could be put onto the broadcast</p> <p>22 when it's done during the interview.</p> <p>23 Q. Okay.</p> <p>24 A. And that's pretty much how Mr. Halbig came to</p> <p>25 be a guest. Now, after that, he's already a guest.</p>	<p>340</p> <p>1 Q. Nope.</p> <p>2 A. I saw one e-mail like that. But like I said,</p> <p>3 it would have been at the behest of the host. So Nico</p> <p>4 isn't the one that would say, okay. Well, I want to</p> <p>5 get Mr. Halbig on. I don't know what prompted that</p> <p>6 series of e-mails is --</p> <p>7 Q. You know what I mean when I say the Super</p> <p>8 Bowl picture?</p> <p>9 A. Yes, I know the Super Bowl picture.</p> <p>10 Q. All right. You know that was provided to the</p> <p>11 company; right?</p> <p>12 A. For Mr. Halbig? Yes.</p> <p>13 Q. For this episode.</p> <p>14 A. That picture was not aired on this --</p> <p>15 Q. I didn't --</p> <p>16 A. -- on this --</p> <p>17 Q. I never said that.</p> <p>18 A. It was provided to the company, but it was</p> <p>19 never used.</p> <p>20 Q. And it was thank -- the company thanked him</p> <p>21 for it; right?</p> <p>22 A. If that's what the e-mail says.</p> <p>23 Q. Right. Okay. So what we do know is that</p> <p>24 before Mr. Halbig was put back on the air, and you had</p> <p>25 an InfoWars person, the person who was responsible for</p>
<p>339</p> <p>1 And so there's not any -- anything else done after that</p> <p>2 to either pull more material from him or anything like</p> <p>3 that.</p> <p>4 Q. Okay. So in terms of what information</p> <p>5 Mr. Halbig provided the company that prompted his</p> <p>6 booking on this show on March 24th, 2015, you haven't</p> <p>7 seen anything like that?</p> <p>8 A. On this particular show?</p> <p>9 Q. For that video, uh-huh.</p> <p>10 A. No. As far as it appears, it appears that</p> <p>11 Mr. Jones is talking about the issue specifically</p> <p>12 related to the copyright claims on his YouTube page,</p> <p>13 and that may have been the impetus. But I don't -- I</p> <p>14 don't know the -- I don't know for sure.</p> <p>15 Q. Again, here's another strange one for me.</p> <p>16 Because when I was in Ms. Karpova's deposition, there</p> <p>17 was a document discussed in her deposition that's</p> <p>18 e-mails between Mr. Halbig and -- and Nico about this</p> <p>19 show. You have seen this?</p> <p>20 A. To book his show?</p> <p>21 Q. Yeah, and the materials that Mr. Halbig</p> <p>22 provided. Have you not seen that?</p> <p>23 A. I saw an e-mail that doesn't have any</p> <p>24 documents attached. Is that the e-mail that you're</p> <p>25 referring to?</p>	<p>341</p> <p>1 booking -- getting the guests set up and coming on the</p> <p>2 show, had been directly provided a copy of the Super</p> <p>3 Bowl picture; right?</p> <p>4 A. I don't think that that -- I don't -- I don't</p> <p>5 agree with your phrasing. I'm sorry. I think what</p> <p>6 you're -- what you're saying is that Nico requested</p> <p>7 documents and then he provided them and he thanked him</p> <p>8 and he reviewed what was attached prior to thanking him</p> <p>9 as if he was actually going to use these documents.</p> <p>10 And I don't know that that was the case.</p> <p>11 Q. You -- I mean, I -- I would like to know.</p> <p>12 A. I don't think that that was the case.</p> <p>13 Especially because it wasn't used. I don't know that</p> <p>14 Nico reviewed --</p> <p>15 Q. Look. I'm -- I've got to make this real</p> <p>16 clear for you and that this is going to be true</p> <p>17 tomorrow too. I'm not terribly interested in answers</p> <p>18 that start with, I don't think, or, I think, or, it</p> <p>19 might be, or, it could be, or, my assumption is, or, my</p> <p>20 inference is. I'm -- going forward, I'm not interested</p> <p>21 in those answers.</p> <p>22 What I -- what I -- I want you to tell me if</p> <p>23 you can testify to today, right, is that prior to this</p> <p>24 episode, that there were communications between Nico</p> <p>25 and Mr. Halbig that included the Super Bowl picture and</p>

<p>342</p> <p>1 you did not review them before coming to this 2 deposition? 3 A. I reviewed the e-mail with the Super Bowl 4 picture. I've seen that. 5 Q. Okay. 6 A. But any other e-mails besides that, I -- I 7 don't know if I reviewed anything like that. 8 Q. Okay. 9 A. If you could point me to it and I could look 10 at it, maybe I could testify a little bit better. But 11 as I sit here right now, I can't recall. 12 Q. I brought you here to point me to things. 13 I'm tired of pointing you to things. 14 A. Sir, there's a hundred thousand plus 15 documents. 16 Q. Yeah, so maybe you shouldn't have been the 17 only designee. 18 A. I'm sorry, but I am. 19 Q. I -- I don't -- sorry's not going to cut it. 20 I can tell you that. Ms. -- Ms. Blott knows what's 21 coming up and it's not an apology. That's not what's 22 happening. Okay? But I understand. I completely 23 sympathize with you. 24 Like I've said before, I understand that as 25 you as one person, no way you can answer all these</p>	<p>344</p> <p>1 A. Yes. 2 Q. Okay. And so this is a video -- one of the 3 things we had just talked about how it is difficult, if 4 not impossible, for you to testify about the broad 5 depth of all of these things. But it's certainly 6 impossible to testify about this video if you haven't 7 watched it; right? 8 A. I don't have this video, so no. I can't 9 testify as to it. 10 Q. Yeah. And you don't know the title of it, do 11 you? Because I've been trying to figure that out. 12 A. No, I don't. 13 Q. Okay. There are -- do you know that there 14 are people interviewed on that show who gave 15 information about Mr. Pozner? 16 A. I don't know anything about the video, sir. 17 Q. Okay. Have you reviewed any documents about 18 the video? 19 A. Aside from my conversation with Mr. Dew about 20 the video, I don't recall seeing much in the 21 production. But if you can direct my attention. 22 MR. BANKSTON: Are we on 11? 23 THE COURT REPORTER: Yes. 24 Q. (BY MR. BANKSTON) Can you tell me if you've 25 ever seen that before?</p>
<p>343</p> <p>1 topics. There is no way you can possibly assimilate 2 all of this stuff. Do you agree with that? 3 MS. BLOTT: Is there a question? 4 MR. BANKSTON: I just asked her one, 5 does she agree with that. Yeah, that's a question, 6 Jacquelyn. 7 A. I can't cite to a specific page based on a 8 hundred thousand pages of documents. 9 Q. (BY MR. BANKSTON) It would be impossible for 10 you to do that. 11 A. It's not possible -- humanly possible. 12 Q. Right. For one person to cover any number of 13 this stuff; right? 14 A. I don't think so. 15 Q. Right. It -- it's -- for -- let's talk about 16 paragraph 35. Do you see paragraph 35? 17 A. Yeah. 18 Q. Okay. 19 A. February 12, 2015. 20 Q. Uh-huh. You don't need to go looking because 21 you haven't watched this one. 22 A. Okay. 23 Q. So this is the video we discussed earlier 24 about Mr. Pozner. Do you remember us talking about a 25 video about Mr. Pozner and his address?</p>	<p>345</p> <p>1 (Exhibit No. 11 marked.) 2 A. Yes. 3 Q. (BY MR. BANKSTON) You talked to Dr. Jones? 4 A. No. Dr. Jones, unfortunately, is not a good 5 source of information. 6 Q. What do you mean by that? 7 A. I mean that he has some medical issues that 8 makes his memory a little poor. 9 Q. Okay. 10 A. So he wouldn't have been -- it wouldn't have 11 been a very productive conversation. 12 Q. When did he leave the company? 13 A. That, I -- that, I do not know. 14 Q. Very recently; right? 15 A. I don't know. I know that he still has 16 ownership interest in the -- in PQPR. But aside from 17 the ownership interests he has in PQPR, I don't know 18 when he left Free Speech. 19 Q. In fact, because of the circumstances of this 20 lawsuit and what it may mean, it was advantageous if 21 Mr. Jones no longer worked for the company, you would 22 agree with that? 23 A. No. 24 MS. BLOTT: Objection. Argumentative. 25 And not -- assumes facts not in evidence.</p>

<p>346</p> <p>1 A. I don't -- I don't know what Dr. Jones would 2 have to do with that at all. 3 Q. (BY MR. BANKSTON) Really? When Mr. Jones is 4 the owner of the entity where all the money's being 5 put? 6 A. All the money is not being put into Free 7 Speech. 8 Q. That's exactly what I mean. He's not -- I'm 9 talking about David Jones. 10 A. You mean Dr. Jones? 11 Q. Dr. Jones, yes. 12 A. So your question regarding Dr. Jones is what? 13 Q. Right. That it's important, it is useful, it 14 is advantageous for him to no longer work for Free 15 Speech Systems, given the consequences of this 16 potential lawsuit? 17 A. I don't know that that's true, no. 18 Q. Okay. Do you know who Mr. Enoch is, talked 19 about in this e-mail? 20 A. I think that was one of our attorneys at the 21 time. 22 Q. Okay. And then they're talking about an 23 apology that should be made part of a landing spot in 24 public relations. Do you know what apology they're 25 talking about?</p>	<p>348</p> <p>1 there's a guest on the show, an Independent Media 2 Solidarity member, who says, Lenny, your day is coming, 3 my friend. It is coming. And Mr. Jones replies, they 4 made a major mistake involving us. And then the person 5 says, go after them, Alex. Crush them. And then Alex 6 says, I'm not somebody to mess with. Okay? You've 7 never seen that; right? 8 A. I've never seen that, no. 9 Q. All right. By the same token -- well, we've 10 already talked -- you've already told me there's no 11 editorial discussion. So I -- I don't know how exactly 12 to ask this. But were there any kind of discussions in 13 the family about saying that stuff to a Sandy Hook 14 parent, the stuff I just quoted? 15 A. What do you mean, in the family? 16 Q. I mean, inside -- I'm sorry. Let me rephrase 17 that question. 18 A. Sure. 19 Q. Were there any discussions inside the company 20 about saying that kind of stuff to a Sandy Hook parent? 21 A. No. 22 Q. Okay. Does the company right now feel that 23 it was appropriate to threaten him in front of millions 24 of people? 25 A. I don't think that that's a threat.</p>
<p>347</p> <p>1 A. No, not specifically. I know Mr. -- 2 Mr. Jones has done a number of apologies. Maybe that's 3 one of the ones they're referring to, but I'm not sure. 4 Q. Okay. So again, I'm going to ask you some 5 statements about this video. I know you've already 6 told me you don't know anything about it, so I don't -- 7 I don't expect anything. But I need to ask these. Is 8 -- when Mr. Jones said, is HONR partnered with Fox on 9 their fraud on the First Amendment, when did he -- do 10 you know what he meant by that? 11 A. Is HONR -- HONR, the company, partnered with 12 Fox? 13 Q. Uh-huh. 14 A. No, I don't know. 15 Q. Okay. They said on that episode, it was a 16 felony to release birth certificates or death 17 certificates. Do you know about that claim? 18 A. I don't know about that claim, no. 19 Q. Okay. And so you haven't talked to anybody 20 or done any research to figure out where that came 21 from; right? I would think if you don't know the 22 claim. 23 A. I don't know what he's referring to with that 24 claim, so I -- I really can't speak to it. 25 Q. Okay. There's a part on that show where</p>	<p>349</p> <p>1 Q. When I -- can you go to paragraph 30 for me. 2 A. 30, three zero? 3 Q. Uh-huh. 4 A. Okay. 5 Q. That is December 29th, 2014. America, the 6 False Democracy. Have you watched that video? 7 A. I might have it as a different upload date. 8 And the reason why I say that is because -- and I don't 9 know if you -- you have our ID on it. Because I have a 10 -- I have a couple of videos around that date. One 11 second. Yeah, it might be saved under a different 12 name. But I remember seeing those or hearing, watching 13 those particular statements by Mr. Jones. 14 Q. What -- I don't understand. What -- what 15 name? 16 A. So around the same time, I have videos on 17 12/12. 18 Q. Okay. 19 A. Two videos on 12/12. And then I have videos 20 on 12/16, 12/27. 21 Q. Okay. 22 A. But no videos specifically on 12/29. And 23 that could be that just they were -- they were uploaded 24 on a different day. So -- but like I said, I -- I 25 recall watching -- seeing these particular statements.</p>

<p>350</p> <p>1 Q. Well, as you may -- as I'm sure you recall, 2 Mr. Jones repeats himself quite a lot. So I -- I'm -- 3 I don't have any way to verify -- I mean, I guess right 4 now, the answer is you don't know if you watched this 5 video? 6 A. I don't -- I don't know just because, you 7 know, the way that your -- in your petition referencing 8 videos is not the way internally we reference videos. 9 Q. Okay. 10 A. So -- 11 Q. All right. Well, let's skip that video, I 12 guess. 13 A. Well, we could try to talk about it. 14 Q. I'd -- I'd rather not waste your time. Can 15 you go to paragraph 25. 16 A. Sure. 17 Q. Do you see there's a September 25th, 2014 18 video? In fact -- 19 A. Yes. 20 Q. I'm sorry. The video before that too, just 21 to make sure I have it on the record, you don't know 22 who worked on that video? 23 A. What video before that? 24 Q. The one that you don't know if you've watched 25 it. The one from December 29. You don't know who</p>	<p>352</p> <p>1 Q. Got you. So -- so -- so watching the 12/27 2 video does not necessarily mean you've watched the 3 12/29 video? 4 A. Right. 5 Q. Got you. 6 A. I'm just not sure that they're the same 7 video. Or -- 8 Q. I'm not either. 9 A. -- videos. Yeah. 10 Q. I don't know either. 11 A. But -- but yes, I can tell you who's working 12 on 12/29. 13 Q. Can I see that list real quick. 14 A. Sure. 15 Q. On 12/27, that's the day we only have one 16 name; right? 17 A. Right. 18 Q. Okay. All right. Well, let me start asking 19 you about some of these people later, I guess. We'll 20 do that all at one time. You can go ahead and have 21 that back. All right. So here we are again at -- at 22 paragraph 25, which is September 25th, 2014. All 23 right? You're with me so far? 24 A. Yeah. 25 Q. Okay. The title of the video is Connecticut</p>
<p>351</p> <p>1 worked on that video? 2 A. Who worked on it, no. I could review the 3 document and see if it's on there. Let me just check. 4 So I'm looking at Exhibit 6. 5 Q. Uh-huh. 6 A. So on 12/27 -- oh, 12/29, yes. So this 7 document does have a list of all of the people working 8 on 12/29/2014. So yes. 9 Q. Okay. So that would be -- that'd be a 10 different day than 12/27. Do you also -- do you also 11 have a listing for 12/27? 12 A. This is -- your -- paragraph 30 says 12/29. 13 Q. I know. 14 A. And this says 12/29. 15 Q. I know. 16 A. So there is another separate list for 12/27, 17 yes. 18 Q. That's what I'm asking. Okay. 19 A. There are two of those. 20 Q. So in other words, the video that you thought 21 you may have watched that was that video that's on 22 12/27, it's not, there's a different list for that? 23 A. There's two separate lists here. 24 Q. Right. 25 A. 12/27 and 12/29.</p>	<p>353</p> <p>1 PD has FBI Falsify Crime Statics; right? 2 A. Yeah, I see it. 3 Q. Can you explain what that refers to? What's 4 that title mean? 5 A. That is specifically referencing that article 6 that Adan wrote regarding the FBI crime statistics that 7 we've previously talked about. 8 Q. No, I understand the article -- there's an 9 article much later than this called Nobody -- FBI Says 10 Nobody Died At Sandy Hook. Do you understand that? 11 A. Uh-huh. 12 Q. Okay. And do you know when that article was? 13 A. When did Adan write that article? 14 Q. Yeah, because this is in -- I mean, I'll tell 15 you it's in 2015. 16 A. Okay. 17 Q. So this is before that. And I don't 18 understand what the Connecticut PD would have to do -- 19 A. Well, I don't know which police department 20 they're referring to there, but -- 21 Q. What do you mean, Connecticut PD? 22 A. There's no such thing as Connecticut PD. 23 Q. I guess not; right? Like, I don't know -- so 24 yeah, I don't know either. Can you help me? I don't 25 know anything about this. That's what I'm trying to</p>

<p>354</p> <p>1 figure out.</p> <p>2 A. So let me just go to my notes and see if I</p> <p>3 watched it. So it was September 24, 2014. Okay. So</p> <p>4 on September 25th, 2014, which may very well be the</p> <p>5 same video. Because like I said, these are just being</p> <p>6 uploaded on different dates.</p> <p>7 Q. Okay.</p> <p>8 A. These are all upload dates. So our title</p> <p>9 that we have here, I don't know where this title came</p> <p>10 from, Connecticut PD Has FBI Falsify Crime Statistics.</p> <p>11 The title I have here is Sandy Hook Deaths Missing From</p> <p>12 FBI Report.</p> <p>13 Q. Okay.</p> <p>14 A. And Jakari Jackson did that segment and he</p> <p>15 was talking about the FBI crime statistics. They were</p> <p>16 the same crime statistics that were -- were being</p> <p>17 discussed in that article by Adan.</p> <p>18 Q. All right. And Jakari is a figure -- I guess</p> <p>19 -- I know he didn't have a title. But, like, I'm going</p> <p>20 to call him a reporter. Are you okay with me calling</p> <p>21 him that?</p> <p>22 A. Sure. Sure.</p> <p>23 Q. Okay. Jakari is a reporter who was active at</p> <p>24 InfoWars over most of the years that we're talking</p> <p>25 about here; right?</p>	<p>356</p> <p>1 Q. I don't know what to tell you.</p> <p>2 A. And they're also not full videos, you know,</p> <p>3 so, like, you might -- Shadow Government Strikes Again</p> <p>4 may be the title of a clip, but it's not the entire</p> <p>5 broadcast. And so the way we're saving it is not the</p> <p>6 same.</p> <p>7 Q. I get that. But I -- I -- we don't know, do</p> <p>8 we?</p> <p>9 A. I know. I mean, but if you have the whole</p> <p>10 show or it's -- if it's in the production, I mean,</p> <p>11 we've produced it.</p> <p>12 Q. Do -- do -- is it the same, do we know?</p> <p>13 A. I don't know if it's the same because your</p> <p>14 date is not the same date that I have.</p> <p>15 Q. Right. So --</p> <p>16 A. And it also might not be the same date</p> <p>17 because this is a clip --</p> <p>18 Q. Maybe?</p> <p>19 A. -- being cut from the original show.</p> <p>20 Q. Maybe?</p> <p>21 A. Maybe, right.</p> <p>22 Q. You don't even know that, do you, Ms. Paz?</p> <p>23 A. Do I know what you're referencing here?</p> <p>24 Q. No, no. You don't even know whether this is</p> <p>25 a full clip or a full episode. You don't know that.</p>
<p>355</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Have you talked to him?</p> <p>3 A. No.</p> <p>4 Q. Okay. Let's go ahead and go to paragraph 17.</p> <p>5 A. Sure. Okay.</p> <p>6 Q. That one has a video that's April 16th, 2013</p> <p>7 entitled Shadow Government Strikes Again. Do you see</p> <p>8 that?</p> <p>9 A. Yes.</p> <p>10 Q. All right. Did you watch that video?</p> <p>11 A. Just give me one second. Okay. So again,</p> <p>12 this is another thing where it's -- the videos that we</p> <p>13 have, there's a different date. So the date that's in</p> <p>14 this -- in the petition is April 16, 2013.</p> <p>15 Q. Uh-huh.</p> <p>16 A. I have -- I have one dated for 1/20/13. That</p> <p>17 was a interview with Dr. Pieczenik.</p> <p>18 Q. Right. That's --</p> <p>19 A. It might -- it might be the same video or it</p> <p>20 might be a different video.</p> <p>21 Q. I -- I -- I really don't want answers of it</p> <p>22 might. I don't.</p> <p>23 A. Well, like I said, I don't -- your -- so your</p> <p>24 -- your internal -- our internal system is saving them</p> <p>25 in different ways than you're mentioning them.</p>	<p>357</p> <p>1 A. Well, this -- I don't know. And the reason</p> <p>2 is because that's not how we maintain our videos.</p> <p>3 Like, how you're referencing them here is not how we</p> <p>4 save them.</p> <p>5 Q. Okay. I mean, so at the end of the day, we</p> <p>6 don't know if you've watched this video; right?</p> <p>7 A. I don't know. I can tell you about the video</p> <p>8 that I watched at this -- that was posted -- uploaded</p> <p>9 around this time period and if it's the same video.</p> <p>10 Q. No, because we really need to make sure on</p> <p>11 the fifth time I'm trying to take this deposition that</p> <p>12 we're actually talking about what we need to talk</p> <p>13 about. So I don't want you to guess about what video</p> <p>14 might be this video and let's talk about that. I don't</p> <p>15 want to do that.</p> <p>16 A. Right. So, I mean --</p> <p>17 Q. Okay. So we don't -- the easiest is, we</p> <p>18 don't know if you watched this video; correct?</p> <p>19 A. I don't know if it's the same video that's --</p> <p>20 that you're referencing, no.</p> <p>21 Q. You know who Buckley Hamman is?</p> <p>22 A. Yes.</p> <p>23 Q. Okay.</p> <p>24 A. I did not speak to him, though.</p> <p>25 Q. You should have, shouldn't you? Shouldn't</p>



<p>358</p> <p>1 that be somebody you speak to?</p> <p>2 A. I don't know that he's with the company</p> <p>3 anymore.</p> <p>4 Q. I don't think that matters.</p> <p>5 A. Right. But the -- like I said, there's only</p> <p>6 so much time in a day. So I did not speak to him.</p> <p>7 Q. You would understand that he is, according to</p> <p>8 -- Mr. Watson testified to this. During these events</p> <p>9 we're talking about, one of the two most senior people</p> <p>10 at InfoWars. You know that?</p> <p>11 A. Well, so Mr. Watson is a correspondent and</p> <p>12 he's a consultant. So he really doesn't have that much</p> <p>13 say in the operation or day-to-day. And he's not even</p> <p>14 in the country, he's on the other side of the world.</p> <p>15 But Mr. Hamman, I think, was a direct liaison with</p> <p>16 Mr. Jones.</p> <p>17 And his position was that to speak to</p> <p>18 Mr. Jones, it would be easier to go through Mr. Hamman</p> <p>19 because of his access to Mr. Jones. So I think that's</p> <p>20 probably a more apt way to describe it, not that he was</p> <p>21 a senior person there.</p> <p>22 Q. Okay. Well, I'm going to go with Mr. Watson</p> <p>23 because he works there. I --</p> <p>24 A. He doesn't work there, he's a consultant.</p> <p>25 Q. Well, we'll see about that. But -- but when</p>	<p>360</p> <p>1 two most senior people at the company, right, then --</p> <p>2 that Mr. Watson says to find about, he's the other one.</p> <p>3 Did you know that?</p> <p>4 A. Again, I don't just agree with the way you're</p> <p>5 characterizing them as senior people.</p> <p>6 Q. Well, let's go ahead and just try to do it</p> <p>7 this way. Both Buckley Hamman and Anthony Gucciardi</p> <p>8 are management-level employees at InfoWars when they</p> <p>9 were there. You agree with that?</p> <p>10 A. To the extent that there was management. I</p> <p>11 -- I don't know that there was such a structure there.</p> <p>12 Q. Well, we've already talked about that you've</p> <p>13 already told me that people had supervisory powers at</p> <p>14 InfoWars.</p> <p>15 A. There were people who supervised specific</p> <p>16 departments, yes.</p> <p>17 Q. And these people supervised quite a few</p> <p>18 people, didn't they?</p> <p>19 A. I don't know who they supervised.</p> <p>20 Q. That's troubling. When -- you haven't talked</p> <p>21 -- you haven't spoken to Buckley or Anthony; right?</p> <p>22 A. No.</p> <p>23 Q. Okay. And haven't made any efforts to speak</p> <p>24 to either one of them?</p> <p>25 A. No.</p>
<p>359</p> <p>1 I talk about the batshit crazy e-mail, you know what</p> <p>2 I'm talking about?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. Because I know there's a lot of</p> <p>5 e-mails in this, like, I'm talking -- I'm not just</p> <p>6 saying there's an e-mail that's batshit crazy, there's</p> <p>7 a lot of those. I'm talking about there's an e-mail</p> <p>8 that specifically uses the phrase batshit crazy. You</p> <p>9 know what I'm talking about?</p> <p>10 A. Yes, Mr. Watson used it.</p> <p>11 Q. Okay. Okay. And -- and Mr. Hamman's on that</p> <p>12 e-mail; right?</p> <p>13 A. I think he's copied on that e-mail, yes.</p> <p>14 Q. He actually responds too, doesn't he?</p> <p>15 A. Yes.</p> <p>16 Q. And he talks about steps that he wants to</p> <p>17 take?</p> <p>18 A. In his opinion, that he thinks should be</p> <p>19 taken, yes.</p> <p>20 Q. Okay. Who is the other person on the e-mail,</p> <p>21 do you know?</p> <p>22 A. I don't recall, I'm sorry.</p> <p>23 Q. Anthony Gucciardi. You know who that is?</p> <p>24 A. Not off the top of my head.</p> <p>25 Q. Okay. He's the other person. He's -- of the</p>	<p>361</p> <p>1 Q. Buckley wouldn't be hard to get a hold of</p> <p>2 because that's Alex's cousin; right?</p> <p>3 A. I don't know if he is or isn't.</p> <p>4 Q. All right. I --</p> <p>5 THE COURT REPORTER: Mr. Bankston?</p> <p>6 MR. BANKSTON: Yeah?</p> <p>7 THE COURT REPORTER: I could use a</p> <p>8 break when you get to a stopping point.</p> <p>9 MR. BANKSTON: Let's do it right now.</p> <p>10 Perfect time.</p> <p>11 THE VIDEOGRAPHER: 4:31 off.</p> <p>12 (Recess from 4:31 p.m. to 4:47 p.m.)</p> <p>13 THE VIDEOGRAPHER: On the record.</p> <p>14 4:47.</p> <p>15 Q. (BY MR. BANKSTON) Okay. I had asked you</p> <p>16 earlier if you had talked to Jakari Jackson and I know</p> <p>17 you said no.</p> <p>18 A. Right.</p> <p>19 Q. Did you try to talk to Jakari Jackson?</p> <p>20 A. No.</p> <p>21 Q. Okay. Darrin McBreen, that's another person</p> <p>22 you didn't talk to; right?</p> <p>23 A. Right.</p> <p>24 Q. Did you try to talk to Darrin?</p> <p>25 A. No.</p>

<p>362</p> <p>1 Q. Okay. Mr. Jones very recently, and we --</p> <p>2 actually, this was in a court hearing, we played this.</p> <p>3 Talked about his archivist. Do you know who I'm</p> <p>4 talking about? All right. Mr. Jones, there was a --</p> <p>5 A. No.</p> <p>6 Q. -- clip we played in -- in a hearing. And we</p> <p>7 actually played it in Mr. Jones' deposition too, I</p> <p>8 believe. That Mr. Jones says, I have an archivist on</p> <p>9 staff. He does incredible work. He should be paid</p> <p>10 about \$100,000 a year. Instead, he's only paid \$20,000</p> <p>11 a year, which is a terrible shame.</p> <p>12 But I don't understand that because Mr. Jones</p> <p>13 is the one who pays him. But he says the guy is like a</p> <p>14 bloodhound and can find anything. Do you know who he's</p> <p>15 talking about?</p> <p>16 A. I'm sorry, I don't know who he's talking</p> <p>17 about.</p> <p>18 Q. Okay. I don't either.</p> <p>19 A. I don't know.</p> <p>20 Q. Do you know if an archivist exists at</p> <p>21 InfoWars?</p> <p>22 A. I -- I don't have any reason to believe that,</p> <p>23 but, I mean, he may be referring to a third party</p> <p>24 company. But I don't -- I've not been able to find</p> <p>25 anyone at InfoWars that has such a job.</p>	<p>364</p> <p>1 A. And that he's using that to inform his</p> <p>2 opinion.</p> <p>3 Q. Okay.</p> <p>4 A. But no, he's not doing -- he's not doing</p> <p>5 investigative research.</p> <p>6 Q. Okay. I want to -- and I'm just going to use</p> <p>7 this to mark where it is on the page, basically. Right</p> <p>8 around here. That area of the page. Do you see where</p> <p>9 it talks about a paragraph 30 somewhere in there? See</p> <p>10 the line that starts with paragraph 30?</p> <p>11 A. Yes, so these are my notes.</p> <p>12 Q. Right. And part of your notes says that</p> <p>13 Mr. Jones represents that he did deep research;</p> <p>14 correct?</p> <p>15 A. That's what he says in that video.</p> <p>16 Q. Okay.</p> <p>17 A. I quoted the video.</p> <p>18 Q. Okay. Can you -- actually, let me see that</p> <p>19 page again. I'm sorry. I wish --</p> <p>20 A. Oh, see, I did watch the video.</p> <p>21 Q. There's one. Wow, yeah, that's one that you</p> <p>22 didn't seem to think you did watch, did you?</p> <p>23 A. Right. That's what I'm saying is that I</p> <p>24 think that, you know, the issues that we have is just</p> <p>25 the naming of the certain videos and how they're saved.</p>
<p>363</p> <p>1 Q. Okay. And I notice you said, like, for</p> <p>2 instance, Mr. Jones himself -- or really the company</p> <p>3 itself really isn't in the business of research; right?</p> <p>4 They're -- they're a punditry company; right?</p> <p>5 A. Yes.</p> <p>6 Q. So Mr. Jones hasn't, like, done research on</p> <p>7 Sandy Hook; right?</p> <p>8 A. I think that he -- in the sense that he's</p> <p>9 seen other things in other places, he does use the term</p> <p>10 research. But as far as verifying what he's seeing,</p> <p>11 no. But when he's informing his own opinion on</p> <p>12 something, he may call it research. But that goes back</p> <p>13 to, you know, Mr. Jones has a lot of terms and words</p> <p>14 that he uses that aren't necessarily the words that you</p> <p>15 and I would use.</p> <p>16 Q. Okay. So, I mean, in other words, it might</p> <p>17 be -- it might be to say that he did research in a more</p> <p>18 casual way than what we would normally think of as</p> <p>19 research. He does more casual stuff. But he's not out</p> <p>20 there doing deep research?</p> <p>21 A. He's not doing deep research, but when he's</p> <p>22 saying research, I think what he means is that he is --</p> <p>23 he is looking at the things that we are -- that we're</p> <p>24 referencing.</p> <p>25 Q. Uh-huh.</p>	<p>365</p> <p>1 Q. Doesn't seem to be an issue at all here. It</p> <p>2 says 12/29/14 video, America the False Democracy.</p> <p>3 A. Right. But that's not -- what I'm saying is</p> <p>4 that's not how it's saved in our -- in our documents.</p> <p>5 Q. Okay. All right.</p> <p>6 A. It might have been the title of the video</p> <p>7 once it was played, but it's not how it's saved.</p> <p>8 Q. Do you see a reference -- do you see a</p> <p>9 reference page 97?</p> <p>10 A. One second.</p> <p>11 Q. You'll see a list of page numbers --</p> <p>12 A. Yes, yes. I think this was the deposition.</p> <p>13 Q. Yeah --</p> <p>14 A. Yes.</p> <p>15 Q. -- that's Ms. Karpova's deposition.</p> <p>16 A. Yes.</p> <p>17 Q. What I want to ask you about is you have a</p> <p>18 note written down there and it says, Alex said these</p> <p>19 kids didn't die because he has a big heart and he</p> <p>20 wanted to hold out hope they weren't dead. That was</p> <p>21 the company's testimony from Ms. Karpova; correct?</p> <p>22 A. That is Ms. Karpova's --</p> <p>23 Q. Okay.</p> <p>24 A. -- testimony.</p> <p>25 Q. And that's the company's testimony; right?</p>

<p>366</p> <p>1 A. She was a representative, at the time, of the 2 company, so yes.</p> <p>3 Q. Does the company still stand by that 4 testimony or does the company think maybe it should 5 change that testimony?</p> <p>6 A. I think what I said earlier was that a vast 7 majority of Mr. Jones' opinions as -- as broadcast were 8 that, I don't know if kids died. I'm not sure. I 9 don't know enough to form that opinion, but this may be 10 a false flag operation. Maybe the government was 11 involved. That kind of thing.</p> <p>12 Q. That's not what this is; right?</p> <p>13 A. I don't know what she's referencing here. I 14 think what she's saying and what the context of that 15 is, is that if he said kids didn't die, this is the 16 reason why he said it. That's what I took that to 17 mean.</p> <p>18 Q. And he did say that; right? He did say kids 19 didn't die --</p> <p>20 A. I can reference --</p> <p>21 Q. -- multiple times?</p> <p>22 A. I don't know about multiple times, but I do 23 know of at least one time that he said kids didn't die. 24 But on the whole, more times than not, he said he 25 didn't know whether kids died.</p>	<p>368</p> <p>1 A. Is this one of the ones I said I didn't have 2 that exact date? I think that might be --</p> <p>3 Q. Maybe that's why we didn't get to cover that.</p> <p>4 A. Right.</p> <p>5 Q. I think you're right.</p> <p>6 A. I think that's the one where I don't know if 7 I watched it just because the dates are not --</p> <p>8 Q. Yeah, I didn't -- you're -- you're a hundred 9 percent right. I didn't update my own notes.</p> <p>10 A. Okay.</p> <p>11 Q. That's my fault. Okay. So that's -- that 12 one, we can't talk about. Let me -- can you go to page 13 14 of your notes.</p> <p>14 A. Sure. Okay.</p> <p>15 Q. At the very bottom of the page, who is 16 identified as researchers?</p> <p>17 A. This is my notes about Rob Dew's corporate 18 rep deposition. And in his deposition, he was asked 19 who researchers were. And he made these -- he named a 20 few names.</p> <p>21 Q. Okay. Can you tell me what those names are 22 right there?</p> <p>23 A. Darrin McBreen, Nico, Buckley Hamman, and 24 Darrin does graphics. That's what he said.</p> <p>25 Q. Okay. So let's first start with those three</p>
<p>367</p> <p>1 Q. That's -- I mean, good for him; right? He 2 should be saying -- like, that's -- if that's our 3 floor, you know what I mean? Like, does that -- let me 4 ask you this question. Is it the company's position 5 that its nondefamatory statements cancel out its 6 defamatory statements?</p> <p>7 A. The company's position is that that is an 8 opinion.</p> <p>9 Q. Okay. Well, it's not the court's position, 10 so that's a good thing. Let -- let me actually take 11 you back. I believe you did watch the video and I 12 didn't get the chance to ask you about this. On 13 September 25th, 2014 on paragraph 25, the one we were 14 talking about Connecticut PD has FBI Falsify Crime 15 Statistics.</p> <p>16 A. I'm sorry, which paragraph?</p> <p>17 Q. 25.</p> <p>18 A. Okay. Yes.</p> <p>19 Q. One of the claims in that video was there are 20 photos of kids who are still -- and were still alive 21 that they said died. What photos are being talked 22 about here? What is Mr. Jones talking about?</p> <p>23 A. This is in that broadcast, the September 24 25th, 2014?</p> <p>25 Q. Yup.</p>	<p>369</p> <p>1 people. The only person you talked to there was Nico; 2 right?</p> <p>3 A. Yes.</p> <p>4 Q. Didn't talk to Buckley?</p> <p>5 A. I don't -- no, I didn't. I don't think I 6 talked to Buckley.</p> <p>7 Q. Didn't talk to Darrin McBreen?</p> <p>8 A. No.</p> <p>9 Q. Didn't try to talk to Darrin McBreen?</p> <p>10 A. No.</p> <p>11 Q. Okay. There are some other people that he 12 keeps listing.</p> <p>13 A. Yeah.</p> <p>14 Q. Are those more researchers?</p> <p>15 A. No. I think that that part of the 16 deposition, he moved on and he just started listing -- 17 or no, maybe that wasn't even him. It was you. You 18 had asked about a number of different people in the 19 deposition. That's why there were question marks. So 20 no, those are not researchers.</p> <p>21 Q. Okay.</p> <p>22 A. Or he named as researchers.</p> <p>23 Q. Okay. Let's talk a little bit -- have you 24 reviewed any documents that set forth a figure for 25 InfoWars' audience size during any of the times</p>

<p>370</p> <p>1 relevant to this lawsuit?</p> <p>2 A. So as far as the audience size, and I'm aware</p> <p>3 that there was -- that's one of the topics that we need</p> <p>4 to discuss today in the deposition regarding the</p> <p>5 audience side. And based on my conversations with</p> <p>6 Mr. Jones, it's really not possible to accurately state</p> <p>7 what the audience size is for a variety of reasons.</p> <p>8 A, not only is he on a bunch of stations,</p> <p>9 but, you know, he's on the Internet and it's free to</p> <p>10 air and everyone all over the world can broadcast it.</p> <p>11 So, I mean, if you want to see what his reach is, I</p> <p>12 mean, the whole planet is the reach. I don't think</p> <p>13 that there really is a way to narrow that down in any</p> <p>14 real fashion.</p> <p>15 Q. Okay. That wasn't the question I asked. The</p> <p>16 question --</p> <p>17 A. Sure.</p> <p>18 Q. -- I asked you was, have you reviewed any</p> <p>19 documents that set forth InfoWars' total audience size.</p> <p>20 And I'm going to take it by your answer that the</p> <p>21 implication is that no, you have not.</p> <p>22 A. I don't think there are any documents that</p> <p>23 exist like that.</p> <p>24 Q. Yeah, there are.</p> <p>25 A. There are Google analytics about the website</p>	<p>372</p> <p>1 Q. But you haven't seen this document. And I'm</p> <p>2 guessing --</p> <p>3 A. I don't know what you're referring to.</p> <p>4 Q. And I'm about to tell you. That you</p> <p>5 understand Mr. Daniels had his deposition taken in</p> <p>6 Lafferty; right?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Exhibit 6 to Mr. Daniels' deposition</p> <p>9 is an e-mail from Kit Daniels to Patrick Riley. You</p> <p>10 know who Patrick Riley is?</p> <p>11 A. I'm not sure.</p> <p>12 Q. Okay. Mr. Daniels was writing an e-mail to</p> <p>13 Patrick Riley to set forth for Mr. Riley's request to</p> <p>14 provide him with copy to give him the audience figures</p> <p>15 for InfoWars. And that e-mail from June 28th, 2017 in</p> <p>16 the Lafferty deposition talks about 8.1 million unique</p> <p>17 viewers in January 2017 and 46.3 million global views</p> <p>18 in January 2016. You've never seen that document;</p> <p>19 right?</p> <p>20 A. No.</p> <p>21 Q. Okay.</p> <p>22 A. And I don't want to speculate as to what's in</p> <p>23 it.</p> <p>24 Q. I definitely don't want you to do that. And</p> <p>25 if that document exists, in fact, you don't know what</p>
<p>371</p> <p>1 and the website traffic. I've reviewed those. But</p> <p>2 aside from that, I don't --</p> <p>3 Q. If I was to tell you that there were 8.1</p> <p>4 million unique viewers in January 2017, would you know</p> <p>5 if I'm -- if I'm right or not?</p> <p>6 A. Are you talking about the Google analytics?</p> <p>7 Q. Nope.</p> <p>8 A. I don't know the answer to that.</p> <p>9 Q. Okay.</p> <p>10 A. I reviewed the Google analytics.</p> <p>11 Q. If I told you that there were 46.3 million</p> <p>12 global views in January 2016, would you know if I'm</p> <p>13 right about that?</p> <p>14 A. I wouldn't know if you're right about that.</p> <p>15 But --</p> <p>16 Q. That's before the company started using</p> <p>17 Google analytics; right?</p> <p>18 A. I don't know the answer to that.</p> <p>19 Q. Okay.</p> <p>20 A. But just because those are the number of</p> <p>21 views doesn't mean that's the number -- the audience</p> <p>22 size.</p> <p>23 Q. I -- I know. I mean, I need to start asking</p> <p>24 questions about that.</p> <p>25 A. Right.</p>	<p>373</p> <p>1 viewership it's describing, whether it might be viewers</p> <p>2 of the live show, whether it might be visitors to the</p> <p>3 website, whether it might be YouTube views, whether it</p> <p>4 might be drawn from whatever source, you wouldn't be</p> <p>5 able to testify about that?</p> <p>6 A. No, because I don't know what document you're</p> <p>7 talking about.</p> <p>8 Q. Exactly. Now, in terms of talking to</p> <p>9 Mr. Daniels, did he ever mention that he was working on</p> <p>10 documents that have audience size in them?</p> <p>11 A. No. And that's not really his job</p> <p>12 description.</p> <p>13 Q. So what did you do exactly to determine what</p> <p>14 audiences were reached by the videos in plaintiffs'</p> <p>15 petitions?</p> <p>16 A. So I reviewed the Google analytics data and I</p> <p>17 spoke to Mr. Zimmerman about how to read that data.</p> <p>18 Q. Okay.</p> <p>19 A. And I spoke to Mr. Jones as how to try to</p> <p>20 narrow down the number of people that are viewed or</p> <p>21 reached, rather, by his broadcasts. But I think that</p> <p>22 that's -- that's the universe of what I've reviewed.</p> <p>23 Q. And so the Google analytics, that would tell</p> <p>24 you visitors to the InfoWars.com website; right?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">374</p> <p>1 Q. That would not tell you anything about any of 2 the viewers to any of the other ways that InfoWars 3 videos are distributed; right? 4 A. I'm sorry, I don't understand. 5 Q. Well, you understand InfoWars videos are 6 distributed far more ways than just on the InfoWars.com 7 website; right? 8 A. Yes. 9 Q. Okay. So those analytics don't tell you 10 anything about how -- how many people saw those videos; 11 right? 12 A. No. All it would show is the number of 13 clicks that articles on the site -- 14 (Coughing interruption) 15 THE COURT REPORTER: Can you please -- 16 (Coughing interruption) 17 THE COURT REPORTER: -- repeat your 18 last few words. 19 THE WITNESS: Sure. 20 A. All that would show is the number of clicks 21 that the website would have. 22 Q. (BY MR. BANKSTON) Right. And that doesn't 23 even track the number of viewers of the livestream on 24 the website; right? If you click on the livestream, 25 that doesn't -- you don't get independent numbers for</p>	<p style="text-align: right;">376</p> <p>1 the extent that those YouTube -- those links were 2 embedded in videos -- in -- in articles, I'm sorry. 3 Then I would be able to track those 4 particular articles in the tracking, and the traffic to 5 those articles. 6 Q. Did you do that? 7 A. I think what Mr. Zimmerman did and produced 8 was he produced the website traffic and all of the -- 9 the landing pages and which URLs were -- were related 10 to Sandy Hook and whatnot. And he did that. 11 Q. Is that -- is that something you've reviewed? 12 A. I did see in the production many thousands of 13 landing pages associated with the website, not 14 including -- not just Sandy Hook. Just all of the 15 landing pages. 16 Q. No, what I'm trying to figure out is did you 17 take that information, that raw data and attempt to do 18 anything with it for this deposition? 19 A. No, I just reviewed the raw data. I talked 20 to Mr. Zimmerman about it. I looked at some of the 21 landing pages associated with Sandy Hook to see what 22 their website traffic was. 23 Q. Okay. Do you know who Scott Bronson is? 24 A. I'm sorry, no. 25 Q. And -- and maybe you'll correct me on this,</p>
<p style="text-align: right;">375</p> <p>1 that; right? 2 A. I don't think that's accurate. I think if it 3 -- 4 Q. Okay. 5 A. -- has a -- an InfoWars URL, I think that it 6 tracks the livestream. 7 Q. You're right. You're right. Okay. So if 8 you click infowars.com/watch -- 9 A. Yes. 10 Q. -- you'll hit the livestream? 11 A. Right. 12 Q. But you cannot tell for any particular video, 13 because each of -- so for any day that I want to watch 14 InfoWars, I'm not clicking on a link that's -- that's 15 unique to that date. I'm just clicking on the 16 livestream; right? 17 A. So -- so that -- and the answer to that, I 18 think, is that depends. So, for example, some of these 19 videos are posted or embedded in certain articles. 20 Q. Okay. 21 A. And so if it is embedded in an article, it 22 would be -- have an InfoWars URL. Some of these videos 23 were -- we had stored only on YouTube. And so then, it 24 would not -- if those YouTube links aren't there 25 anymore, it would not be possible to track it. But to</p>	<p style="text-align: right;">377</p> <p>1 because I'm going to use a title; right? 2 A. Uh-huh. 3 Q. And I know they don't have them. But Scott 4 Bronson is the affiliate relations manager at InfoWars. 5 Did you know that? 6 A. I don't know that. 7 Q. Do you know what the affiliate relations 8 department is? 9 A. No. 10 Q. You know Ms. Karpova testified about the 11 affiliate relations department. Do you remember that? 12 A. I'm sorry. 13 Q. Do you remember that Ms. Karpova said in 14 order to answer my questions about dissemination of the 15 InfoWars videos, where they were, what audiences they 16 reach, she would need to talk to affiliate relations. 17 Do you remember her testifying that? 18 A. I don't know if by affiliate relations, she 19 means the IT department. 20 Q. No. 21 A. I don't know what she's terming -- what she's 22 referencing there. 23 Q. She's referencing Scott Bronson, who runs the 24 affiliate relations department for InfoWars affiliates. 25 And that's somebody you've never spoken to; right?</p>

<p>378</p> <p>1 A. I haven't spoken to him, no.</p> <p>2 Q. Okay. You know what GCN is?</p> <p>3 A. I'm sorry?</p> <p>4 Q. GCN. You know what that is?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. And so can you tell the ladies and</p> <p>7 gentlemen of the jury what GCN is, what do they do?</p> <p>8 A. You know, I don't want to misstate it, so I'm</p> <p>9 not --</p> <p>10 Q. Okay.</p> <p>11 A. -- I'd rather -- I don't -- I'm not that</p> <p>12 educated on it to -- to verbalize it that way.</p> <p>13 Q. Are you able to verbalize it at all? Like,</p> <p>14 you have any even rough idea what GCN is?</p> <p>15 A. I just don't want to misstate what it is</p> <p>16 because I'm not a hundred percent sure.</p> <p>17 Q. I mean, like, you -- I want -- I want to know</p> <p>18 what your understanding is, even if it's wrong. Do you</p> <p>19 understand that? Like, what do you understand GCN to</p> <p>20 be? Not what --</p> <p>21 A. I just -- like I said, I'm not sure. So I'd</p> <p>22 rather -- I don't know.</p> <p>23 Q. Do you know what it has to do with, what it's</p> <p>24 associated with? Is it associated with videos?</p> <p>25 A. I thought it was associated with IT, but I</p>	<p>380</p> <p>1 on radio; right? Or do you know?</p> <p>2 A. I don't know.</p> <p>3 Q. GCN -- InfoWars has in the past relied</p> <p>4 frequently on GCN for audience data; right? Or do you</p> <p>5 know?</p> <p>6 A. I don't know.</p> <p>7 Q. Do you know in 2017 or any of the times</p> <p>8 relevant to this lawsuit, do you know how many radio</p> <p>9 stations InfoWars was carried on?</p> <p>10 A. I don't know the number.</p> <p>11 Q. Do you know how many over-the-air television</p> <p>12 stations?</p> <p>13 A. No, I don't know the number. But in the --</p> <p>14 and it's changed over time, too. So --</p> <p>15 Q. Do you know the max that it ever was?</p> <p>16 A. No.</p> <p>17 Q. Can you even ballpark it? Do you have -- I</p> <p>18 mean --</p> <p>19 A. I don't know.</p> <p>20 Q. I mean, you have no idea if -- do you even</p> <p>21 know if InfoWars has ever appeared on over-the-air</p> <p>22 television?</p> <p>23 A. I -- I don't understand the question.</p> <p>24 Q. Okay. Do you know what over-the-air</p> <p>25 television is? Let's start there.</p>
<p>379</p> <p>1 could be wrong, which is why I didn't want to say in</p> <p>2 the first place because I'm not a hundred percent sure.</p> <p>3 Q. IT, meaning the management of technology</p> <p>4 inside of InfoWars?</p> <p>5 A. Right.</p> <p>6 Q. Okay. That's definitely not what GCN is.</p> <p>7 A. Right.</p> <p>8 Q. Okay.</p> <p>9 A. Which is why --</p> <p>10 Q. Let's -- okay. Do you know who Ted Anderson</p> <p>11 is?</p> <p>12 A. No.</p> <p>13 Q. Okay. Ted Anderson runs GCN. GCN is a</p> <p>14 syndicate, like, GCN is where all of InfoWars radio is</p> <p>15 -- maybe not all of it, but a very large substantial</p> <p>16 component of InfoWars radio is through GCN. Do you</p> <p>17 know that?</p> <p>18 A. No.</p> <p>19 Q. Okay. Okay. Genesis and Ted Anderson are</p> <p>20 codefendants in Lafferty.</p> <p>21 A. Okay.</p> <p>22 Q. Did you know that?</p> <p>23 A. I'm not sure.</p> <p>24 Q. Okay. The GCN network, they possess</p> <p>25 information about where InfoWars' shows are broadcast</p>	<p>381</p> <p>1 A. You mean is it being broadcast not just on</p> <p>2 the radio, on TV?</p> <p>3 Q. Uh-huh.</p> <p>4 A. I don't think it's being broadcast on TV, no.</p> <p>5 Q. Okay.</p> <p>6 A. So I'm not --</p> <p>7 Q. Unfortunately.</p> <p>8 A. But the problem is when I've spoken to</p> <p>9 Mr. Jones about this, he hasn't -- so -- and I</p> <p>10 understand what you're saying about GCN. But I don't</p> <p>11 -- when I spoke to Mr. Jones, they're not keeping track</p> <p>12 of this data in any real way. So I don't know that GCN</p> <p>13 does this. It's based on your -- like, I don't know.</p> <p>14 Q. Over the years, InfoWars has frequently</p> <p>15 published GCN audience data on its website, hasn't it?</p> <p>16 A. GCN data or InfoWars data?</p> <p>17 Q. GCN.</p> <p>18 A. I don't know that that has anything to do</p> <p>19 with InfoWars' viewership data.</p> <p>20 Q. That's where InfoWars' show is played, GCN.</p> <p>21 That's a network. That's a radio network.</p> <p>22 A. Okay.</p> <p>23 Q. So it does have something to do with</p> <p>24 InfoWars.</p> <p>25 A. Okay. But it's -- it's --</p>

<p>382</p> <p>1 Q. Never mind. I'm sorry. I -- I forgot you 2 don't have any idea about GCN. 3 A. I don't know, right. 4 Q. Right. Okay. How many cable packages has 5 InfoWars been carried on? 6 A. I don't know. 7 Q. How many OTT services? 8 A. I think Mr. Jones testified to this. I mean, 9 he was on Roku, but then he was taken off of Roku. So 10 at various points in time, there were different OT -- 11 OTT services. 12 Q. That's why I got you here today. I know what 13 he said -- 14 A. Right. 15 Q. And he said -- 16 A. Apart from what he knows -- I don't know 17 anything else apart from what he knows. 18 Q. And you didn't do anything to find out? 19 A. No. I asked Mr. Jones, and that was what he 20 knew. 21 Q. You asked Mr. Jones how many OTT services 22 they were on? 23 A. Right. 24 Q. Okay. 25 A. I talked to Mr. Jones about it and apart from</p>	<p>384</p> <p>1 A. -- he's not keeping track -- it's not 2 something he's keeping track of. 3 Q. He didn't tell you to go to affiliate 4 relations? 5 A. No. 6 Q. How many short-wave -- short-wave stations is 7 InfoWars carried on? 8 A. I don't know. 9 Q. You understand that it is carried on 10 short-wave; correct? 11 A. I don't know. 12 Q. Okay. Worldwide Christian Radio, do you know 13 anything about that? 14 A. No. 15 Q. Okay. So Worldwide Christian Radio might 16 have viewership data on what is received for InfoWars 17 programming on WWCR. Do you -- do you admit to that? 18 A. I don't know. 19 Q. Because you don't know what WWCR is; right? 20 A. I don't know what they have. I don't know 21 what they have. It's not something that we have. 22 Q. I know that. Well, you don't know 23 necessarily what you have; right? 24 A. I know what's been produced and what's in the 25 documents and what we've asked --</p>
<p>383</p> <p>1 his knowledge on the issue, I don't know. 2 Q. And you did not talk to anybody else but 3 Mr. Jones about what OTT services they're on; right? 4 A. Right. 5 Q. Okay. How many satellite services? 6 A. I don't know. 7 Q. Is that the same answer, that the only person 8 you asked was Mr. Jones? 9 A. Generally, when I spoke to Mr. Jones on this 10 topic, his position was he doesn't know and there's 11 really no meaningful way to -- to understand what the 12 reach of -- of the viewership is. 13 Q. Satellite services, there's no -- there's no 14 way to know how many satellite services InfoWars is on? 15 A. I don't know the answer to that. 16 Q. Okay. Certainly, you didn't do anything 17 yourself other than ask Mr. Jones? 18 A. No. 19 Q. And did you ask Mr. Jones specifically about 20 satellites? 21 A. About satellites, no. I just -- we had a 22 general conversation about his viewership. And how we 23 could go about calculating in some meaningful way the 24 viewership. And it's just -- 25 Q. And he didn't --</p>	<p>385</p> <p>1 Q. You don't know what's in the documents. You 2 haven't reviewed every document, have you? 3 A. I haven't reviewed every specific document, 4 but I did try to make an effort to testify cogently on 5 the eight topics that were notified in this deposition. 6 Q. I get you. You made all the effort you 7 could. 8 A. I did. 9 Q. You were in a tough spot, I don't doubt that. 10 I don't doubt that at all. And I'm sure you worked as 11 hard as you could, I'm positive of that. But what I'm 12 trying to get at is, sitting here today, you don't know 13 the answer to these questions about these things -- 14 A. No. 15 Q. -- and you did no independent research to do 16 -- 17 A. I did no independent research, no. 18 Q. Got you. Okay. 19 A. Aside from what was in -- already in the 20 documents, no. 21 Q. Okay. So, for instance, InfoWars collects 22 sales data? 23 A. Well, PQPR collects sales data. 24 Q. It's available to InfoWars. 25 A. It is available.</p>

<p>386</p> <p>1 Q. A hundred percent. Mr. Jones can have --</p> <p>2 I mean, I don't want to play the shell game here.</p> <p>3 A. It's not the same -- no. It's not the same</p> <p>4 company, but it is available, yes.</p> <p>5 Q. Yes, hundred percent available to you. All</p> <p>6 right. That means it's available to you; right?</p> <p>7 A. The sales data, yes.</p> <p>8 Q. Okay. That sales data, what have you done</p> <p>9 with that sales data?</p> <p>10 A. So I have made an attempt to find out the</p> <p>11 sales data. So I did go to the warehouse and review</p> <p>12 the warehouse. And, well, looked at the warehouse and</p> <p>13 spoke to the warehouse person. As well as we have a</p> <p>14 person named Blake, and I think he's been deposed. He</p> <p>15 is in charge of the warehouse and the sales end of it.</p> <p>16 Q. Okay.</p> <p>17 A. So in 2015, we changed our programming. So</p> <p>18 from 2012 to 2015, we can pull the number of clicks per</p> <p>19 article. So for a -- for a certain article, say it's a</p> <p>20 Sandy Hook article, if there was an ad in that article,</p> <p>21 which most -- most of the articles have ads in them, we</p> <p>22 could tell who was redirected from the website based on</p> <p>23 a click from that ad to the store.</p> <p>24 Q. Okay.</p> <p>25 A. We can't tell the conversion rate, whether</p>	<p>388</p> <p>1 to the website.</p> <p>2 It's just telling me, you're now at the</p> <p>3 website, you know, and you've clicked this ad on this</p> <p>4 particular article and you're being redirected.</p> <p>5 Q. All right.</p> <p>6 A. So I don't think there's a way to --</p> <p>7 Q. The other thing InfoWars keeps track of --</p> <p>8 A. -- extrapolate that.</p> <p>9 Q. The other thing InfoWars keeps track of is</p> <p>10 everywhere it sends products.</p> <p>11 A. I'm sorry, what do you mean?</p> <p>12 Q. Well, the product's got to get to the</p> <p>13 customer somehow; right?</p> <p>14 A. I think PQPR maintains records of the</p> <p>15 customers and where their products are being sent once</p> <p>16 they're ordered. So --</p> <p>17 Q. Did you get those -- did you get those</p> <p>18 records?</p> <p>19 A. No, I don't -- PQPR is not Free Speech. Free</p> <p>20 Speech maintains those records. You mean the records</p> <p>21 of specific customers and --</p> <p>22 Q. Yeah, where it went.</p> <p>23 A. No.</p> <p>24 Q. Where you ship stuff to.</p> <p>25 A. No.</p>
<p>387</p> <p>1 anybody purchased anything once they were redirected</p> <p>2 from that ad on that article to the store. But we can</p> <p>3 tell how many times somebody was redirected from that</p> <p>4 page to the store.</p> <p>5 Q. Okay.</p> <p>6 A. Post 2015 through present, we can tell how</p> <p>7 many times a person clicked on an ad in an article --</p> <p>8 in a specific article, was redirected to the store, and</p> <p>9 had purchased something from the store.</p> <p>10 Q. Okay. So what I want to ask you is, how --</p> <p>11 what -- what steps did you undertake, if any? I</p> <p>12 understand that you found yourself in a situation where</p> <p>13 you had an absence of data on audience reach. Okay?</p> <p>14 A. Yes.</p> <p>15 Q. I'm wondering, as maybe a workaround, did you</p> <p>16 go try to use the sales data in any way to try to</p> <p>17 cross-reference that or create some new data set that</p> <p>18 could help you inform the audience size of InfoWars?</p> <p>19 Did you use the sales --</p> <p>20 A. I don't think there's -- I don't think</p> <p>21 there's a way to do that just because the only real</p> <p>22 thing that informs as who's clicking on most particular</p> <p>23 articles from -- from the website. It's not telling me</p> <p>24 how the person ultimately gets to my website. So it's</p> <p>25 not telling me they were redirected from another source</p>	<p>389</p> <p>1 Q. Okay. And so if -- if there's any data there</p> <p>2 that could perhaps be useful or -- or -- or manipulated</p> <p>3 in some way to help us understand better audience reach</p> <p>4 to ideas. That's not something you undertook to do?</p> <p>5 A. No, I don't have the names and where these</p> <p>6 products are being shipped.</p> <p>7 Q. Perfect. Okay.</p> <p>8 A. So what -- what I could -- could say is how</p> <p>9 many total orders were placed on a particular day.</p> <p>10 Like, for example, if a video was uploaded on a</p> <p>11 particular day, how many orders on that day, stuff like</p> <p>12 that.</p> <p>13 Q. But one of the things we can say is that you</p> <p>14 did not yourself -- I just want to make sure I</p> <p>15 understand the things you did; right?</p> <p>16 A. Uh-huh.</p> <p>17 Q. You did not yourself attempt to take any</p> <p>18 sales data, order data, request things from PQPR and</p> <p>19 use that in some way, I mean, I'm just spitballing</p> <p>20 here, to -- to try to create an audience statistic or</p> <p>21 any sort of information informing audience reach?</p> <p>22 A. I mean, I don't know that that can be done.</p> <p>23 Q. I don't either.</p> <p>24 A. But I -- I don't know. Yeah. But did I do</p> <p>25 anything to try --</p>



<p>390</p> <p>1 Q. I'm not --</p> <p>2 A. -- to do that, no. I didn't.</p> <p>3 Q. I'm not suggesting that.</p> <p>4 A. Okay.</p> <p>5 Q. I'm just asking if that happened or not.</p> <p>6 A. No.</p> <p>7 Q. Okay. Okay. Did you review any</p> <p>8 organizational chart for the company to tell you how it</p> <p>9 was structured?</p> <p>10 A. As far as reviewing a chart, no. I based my</p> <p>11 conclusions on the organization of the company based on</p> <p>12 my conversations with -- primarily with Melinda.</p> <p>13 Q. Okay. Well, I'm -- the reason I'm concerned</p> <p>14 is because I requested an organizational chart and I</p> <p>15 didn't get one.</p> <p>16 A. Okay.</p> <p>17 Q. And then surprise, surprise, Lafferty</p> <p>18 deposition, Kurt Nimmo Exhibit 7 is an organizational</p> <p>19 chart of the company with everybody's roles and what</p> <p>20 they do. And I'm wondering if you've ever seen that.</p> <p>21 A. I don't recall seeing that. When you -- when</p> <p>22 you say roles and what they do, you mean Free Speech,</p> <p>23 who and which departments there are and who works in</p> <p>24 each department and who is headed to each department?</p> <p>25 No, I don't recall seeing that. I'm sorry.</p>	<p>392</p> <p>1 has never done any business, you'd be the first person</p> <p>2 who'd be able to tell me that. Is that what you're</p> <p>3 telling me today?</p> <p>4 A. I don't know whether it's ever done any</p> <p>5 business. I can tell you now it doesn't do any</p> <p>6 business.</p> <p>7 Q. No, I want to know for the entire pendency of</p> <p>8 the suit did it do any business?</p> <p>9 A. I -- I don't know how long that it's been,</p> <p>10 but I can tell you right now it doesn't do any</p> <p>11 business.</p> <p>12 Q. Okay. I mean, like, for instance, I've --</p> <p>13 when I first brought this, you know, years ago,</p> <p>14 InfoWars, LLC is the entity listed on the InfoWars</p> <p>15 website. InfoWars, LLC is the entity listed on the</p> <p>16 terms of use for the website. Do you know anything</p> <p>17 about that?</p> <p>18 A. So I know that there's been a lot of</p> <p>19 entanglement between the various LLCs. And there's</p> <p>20 been efforts undergone to make everything more clear</p> <p>21 and structured and organized. So -- and that's -- but</p> <p>22 that's been in the last, you know, handful of years.</p> <p>23 So I don't know how long InfoWars has not</p> <p>24 been conducting any business for. I know that it's not</p> <p>25 being conducted now under InfoWars, LLC.</p>
<p>391</p> <p>1 Q. Okay. So in terms of seeing the company's</p> <p>2 business structure, if there does exist in plaintiffs'</p> <p>3 Exhibit 7 in the Lafferty deposition of Kurt Nimmo, an</p> <p>4 organizational chart of the company, you -- you didn't</p> <p>5 review that in trying to get ready for this topic?</p> <p>6 A. No.</p> <p>7 Q. Okay. Can you describe to me what InfoWars,</p> <p>8 LLC is?</p> <p>9 A. InfoWars, LLC, I don't think actually</p> <p>10 conducts any business. I think it's just a holder. I</p> <p>11 think all of the business is conducted through Free</p> <p>12 Speech.</p> <p>13 Q. You think that?</p> <p>14 A. Actually, I know that. All the business is</p> <p>15 --</p> <p>16 Q. That's what -- I mean --</p> <p>17 A. -- conducted through Free Speech. I don't</p> <p>18 think InfoWars does any actual business. InfoWars,</p> <p>19 LLC.</p> <p>20 Q. Don't think it does?</p> <p>21 A. It doesn't.</p> <p>22 Q. Do you know it does?</p> <p>23 A. Free Speech does all of the business.</p> <p>24 Q. Because if -- if -- let me put it this way.</p> <p>25 If you are saying to me right now, I know InfoWars, LLC</p>	<p>393</p> <p>1 Q. So we can say now, you understand -- right</p> <p>2 now, you understand what the relationship between</p> <p>3 InfoWars, LLC and Free Speech Systems is, which is</p> <p>4 nothing, really, because InfoWars doesn't do anything;</p> <p>5 right?</p> <p>6 A. Right.</p> <p>7 Q. Okay. But in terms of what it used to be,</p> <p>8 during the periods of some of this lawsuit, what the</p> <p>9 relationship between Free Speech Systems and InfoWars,</p> <p>10 LLC is, that's not something you're prepared to</p> <p>11 testify?</p> <p>12 A. I don't know about that, no.</p> <p>13 Q. Okay. Thanks. Can you tell me when is the</p> <p>14 first time in the company that an employee expressed</p> <p>15 there was a problem with InfoWars' coverage of Sandy</p> <p>16 Hook?</p> <p>17 A. Could you be more specific?</p> <p>18 Q. Huh-uh. No, I want to know -- I mean, I want</p> <p>19 to know any time this has happened. I would assume</p> <p>20 that that's something that we've looked into.</p> <p>21 A. I'm sorry. I've -- like I said, I've</p> <p>22 reviewed a lot of documents. And if -- if you can</p> <p>23 redirect me to a specific point in time, then that --</p> <p>24 Q. No, because I want something -- here's --</p> <p>25 here's the problem. So much of what you're telling me</p>

<p style="text-align: right;">394</p> <p>1 is, well, if you already point -- if you can just point 2 to the discovery we've already given you, the discovery 3 we've been repeatedly sanctioned for, if you can point 4 to that discovery, I can testify. 5 My purpose here is not to deal with that 6 discovery. I'm here to find out what still exists that 7 wasn't produced, that hasn't been done. And -- 8 A. The company's position is that we've produced 9 everything that we have. Whether you have that or not, 10 the company's position is we have produced everything 11 that we have. 12 Q. Okay. So since you now have that universe to 13 deal with, can you tell me when was the first time that 14 a person inside the company expressed a problem with 15 InfoWars' coverage of Sandy Hook? 16 A. I don't -- I don't know. Because like I 17 said, I've reviewed a lot of documents. 18 Q. Okay. Can you tell me -- maybe you can't 19 tell me the first time, but do you know -- do you know 20 who was the first person to raise that? 21 A. I don't know who the first person was. I 22 know we've talked about Mr. Watson, who had an issue. 23 I know that -- I can't remember his name. He was 24 deposed. He was a former video person. He was with 25 the company for a long time. I know that he had</p>	<p style="text-align: right;">396</p> <p>1 A. No, I -- I saw Mr. Jacobson's deposition and 2 I saw Mr. Watson's e-mail. 3 Q. Let me rephrase that again -- 4 A. Sure. 5 Q. -- because that's what I'm trying to get at. 6 Other than the two things that you just mentioned to 7 me, those two discussions, you didn't come across any 8 other discussions in the limited set of documents you 9 reviewed? 10 A. No. There was nothing else in the documents. 11 But there was also nothing else in the conversations 12 that I had with InfoWars employees that would have led 13 me to believe there were other such discussions. 14 Q. You find those to be credible people? Your 15 interviews with them, do you think you can rely on 16 those interviews alone, or do you think they need to be 17 fact checked? Knowing what you know now about 18 InfoWars, what do you think? 19 A. I mean, I think I was tasked with 20 interviewing people and I did that. 21 Q. I think -- I think you were actually tasked 22 with trying to come up with all information that the 23 company had reasonably available to it. And I want you 24 to know, do you -- I want to ask you, do you think just 25 simply interviewing some of these employees, knowing</p>
<p style="text-align: right;">395</p> <p>1 expressed some concern. 2 But aside from those two people affiliated 3 with the company, I'm -- I -- I don't know that I can 4 specifically reference. 5 Q. Well, I was hoping to talk about discussions 6 -- 7 A. Jacobson. I'm sorry. That was his name. 8 Jacobson. 9 Q. Okay. I was hoping to talk about discussions 10 with -- inside the company, the various discussions 11 that have happened where people raised problems based 12 on Sandy Hook. You're not totally up to speed on those 13 discussions, I would take it? 14 A. I think that you're assuming there are -- 15 there were such discussions aside from the two that 16 I've mentioned -- 17 Q. I am. 18 A. -- and I don't believe that there have been. 19 Q. Okay. 20 A. Based on my conversations with the people 21 that work there. 22 Q. And the selection of documents that you chose 23 to review out of the entire documents; right? You 24 didn't see that in the selection of documents you 25 reviewed?</p>	<p style="text-align: right;">397</p> <p>1 what you know about them now, do you think that's good 2 enough, or do you think you should be looking at all of 3 the information the company has? 4 A. I did look at all the information. 5 Q. You didn't read all the documents, ma'am. 6 A. I can't read 100,000 pages -- 7 Q. Then you didn't -- then you did not -- then 8 you did not do that; right? 9 A. I did a search for the topics that I was 10 trying to testify cogently on. And I did not see 11 anything else in the documents that were produced that 12 were available to me that relate to that specific type 13 of information. 14 Q. Let's go back. Those -- all the documents 15 were available to you. When you say documents that 16 were available to you, you're talking about the limited 17 set that was provided or that you somehow created. All 18 the documents were available to you; right? 19 A. The documents that are in the Dropbox, you 20 mean? 21 Q. No, I mean every document that's been 22 produced in this case is available to you. 23 A. You see, and that's another issue that we are 24 having just because I know that there are documents 25 that are produced in the Connecticut case. There are</p>

<p>398</p> <p>1 documents that are produced here. I don't know what 2 universe, if any, those documents overlap. 3 But like I said, the documents that are on 4 the Dropbox that were -- that were in production, I did 5 search terms for those and also the interviews. When I 6 talk about interviews, there really aren't other 7 conversations between people that -- of people raising 8 concerns. 9 So, like, for example, Mr. Jacobson in his 10 deposition specifically references a conversation with 11 Adan regarding a conversation they had in his office. 12 I asked Adan about that conversation. I asked how that 13 came to be, what was the content of the conversation. 14 I confirmed that that conversation happened. 15 There was a dispute as to the context of the 16 conversation. But that's in any -- in any conversation 17 with a person, there's going to be three sides to every 18 story. So that's not surprising to me. 19 Q. All right. So you know we've got -- let me 20 just ask you this. We -- we've got this lawsuit which 21 is now heading to trial, going to be in front of a 22 jury. The question of the plaintiffs' compensatory and 23 punitive damages, that's what we're facing right now. 24 And I'm wondering, going into that process, does the 25 company understand what it did wrong?</p>	<p>400</p> <p>1 me, huh-uh, he's a consultant. He doesn't know. He's 2 outside the company. 3 A. That was about the structure of the company. 4 Q. Okay. 5 A. Those were the -- 6 Q. But now when it's convenient for the 7 company -- 8 THE COURT REPORTER: Can you please 9 talk one at a time. 10 Q. (BY MR. BANKSTON) Now when it's convenient 11 for the company that Mr. Watson is a source of 12 information, now he is part of the company; isn't that 13 right? 14 A. No, we've cited to an e-mail and you've 15 relied on an e-mail Mr. Watson has written. He had an 16 independent opinion about the content and how it was 17 being portrayed and that was his opinion as a 18 consultant. We were referencing earlier the business 19 structure and whether he had anything to say about the 20 business structure of the company. 21 Q. Okay. 22 A. Those two things are different. 23 Q. Well, I don't want to know about consultants. 24 I want to know -- 25 A. Okay. You want to know about just employees?</p>
<p>399</p> <p>1 A. I understand that there's been a default 2 judgment, which is -- I don't think the same thing as 3 morally doing something wrong or legally doing 4 something wrong. I guess that that's what my question 5 is. 6 Q. Let's not -- let's do it all. 7 A. Okay. So is your question whether the 8 company thinks it's legally responsible? 9 Q. Let's start there. 10 A. No. 11 Q. Okay. How does it feel morally? Does it 12 understand what it did wrong? 13 A. I think that there are different opinions 14 within the company as far as the coverage. I think 15 Mr. Watson made that clear, that he felt one way about 16 the coverage. 17 Q. Mr. Watson's not in the company. 18 A. Mr. Watson is a consultant. He sent those 19 e-mails -- 20 Q. I'm sorry. I don't mean to interrupt you 21 here, but you made a big point of telling me that no, 22 he's not an employee. 23 A. He's not an employee. 24 Q. And when I said he -- I'm going to trust him 25 because he's inside the company, he knows. You told</p>	<p>401</p> <p>1 Q. No, I want about the company. 2 A. Okay. 3 Q. Company has an opinion. The company's a 4 separate thing from its employees; right? 5 A. Right. 6 Q. The company -- company has subjective beliefs 7 and I want to know what they are. 8 A. I don't know if the company has -- takes a 9 position on the morality of the statements. 10 Q. Thank you. All right. We're done here. 11 THE VIDEOGRAPHER: 5:24 off. 12 THE COURT REPORTER: Mr. Bankston, did 13 you want to get your order on the record? 14 MR. BANKSTON: Let me just put it on 15 the record with you that I would like to get an 16 expedited copy of the transcript as soon as you can 17 make it available to me. 18 The other thing I'll put on the record 19 too is that we're going to be making a copy of Exhibit 20 Book 8 and giving it to you so that Ms. Paz has that 21 for her own use as well. 22 THE COURT REPORTER: Ms. Blott, would 23 you like to order a copy of the transcript? 24 MS. BLOTT: Yes. 25</p>

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<p>1 CHANGES AND SIGNATURE</p> <p>2 Witness NAME: BRITTANY PAZ</p> <p>3 DATE OF DEPOSITION: FEBRUARY 14, 2022</p> <p>4 PAGE LINE CHANGE REASON</p> <p>5 _____</p> <p>6 _____</p> <p>7 _____</p> <p>8 _____</p> <p>9 _____</p> <p>10 _____</p> <p>11 _____</p> <p>12 _____</p> <p>13 _____</p> <p>14 _____</p> <p>15 _____</p> <p>16 _____</p> <p>17 _____</p> <p>18 _____</p> <p>19 _____</p> <p>20 _____</p> <p>21 _____</p> <p>22 _____</p> <p>23 _____</p> <p>24 _____</p> <p>25 _____</p>	<p>1 D-1-GN-18-001835</p> <p>2 NEIL HESLIN )</p> <p>3 VS. ) IN DISTRICT COURT OF</p> <p>4 ALEX E. JONES, INFOWARS, ) TRAVIS COUNTY, TEXAS</p> <p>5 LLC, FREE SPEECH SYSTEMS, ) 261ST DISTRICT COURT</p> <p>6 LLC, and OWEN SHROYER )</p> <p>7 D-1-GN-18-001842</p> <p>8 LEONARD POZNER AND )</p> <p>9 VERNONIQUE DE LA ROSA )</p> <p>10 VS. ) IN DISTRICT COURT OF</p> <p>11 ) TRAVIS COUNTY, TEXAS</p> <p>12 ALEX E. JONES, INFOWARS, )</p> <p>13 LLC, and FREE SPEECH ) 345TH DISTRICT COURT</p> <p>14 SYSTEMS, LLC )</p> <p>15 D-1-GN-18-006623</p> <p>16 SCARLETT LEWIS )</p> <p>17 ) IN DISTRICT COURT OF</p> <p>18 VS. ) TRAVIS COUNTY, TEXAS</p> <p>19 ALEX E. JONES, INFOWARS, )</p> <p>20 LLC, and FREE SPEECH ) 98TH DISTRICT COURT</p> <p>21 SYSTEMS, LLC )</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
403	405
<p>1 I, BRITTANY PAZ, have read the foregoing</p> <p>2 deposition and hereby affix my signature that same is</p> <p>3 true and correct, except as noted herein.</p> <p>4</p> <p>5 _____</p> <p>6 BRITTANY PAZ</p> <p>7</p> <p>8 STATE OF )</p> <p>9 COUNTY OF )</p> <p>10</p> <p>11 BEFORE ME, _____, on this day</p> <p>12 personally appeared BRITTANY PAZ, known to me (proved</p> <p>13 to me on the oath of _____ or</p> <p>14 through _____ (description of identity</p> <p>15 card or other document)) to be the person whose name is</p> <p>16 subscribed to the foregoing instrument and acknowledged</p> <p>17 to me same was executed for the purposes and</p> <p>18 consideration therein expressed.</p> <p>19</p> <p>20 Given under my hand and seal of office this _____</p> <p>21 day of _____, _____. </p> <p>22</p> <p>23 _____</p> <p>24 NOTARY PUBLIC IN AND FOR</p> <p>25 THE STATE OF _____</p>	<p>1 REPORTER'S CERTIFICATION</p> <p>2 DEPOSITION OF BRITTANY PAZ</p> <p>3 FEBRUARY 14, 2022</p> <p>4 I, LOGAN KISLINGBURY, Certified Shorthand Reporter</p> <p>5 in and for the State of Texas, hereby certify to the</p> <p>6 following:</p> <p>7 That the Witness, BRITTANY PAZ, was duly sworn by</p> <p>8 the officer and that the transcript of the oral</p> <p>9 deposition is a true record of the testimony given by</p> <p>10 the Witness;</p> <p>11 That the deposition transcript/errata sheet was</p> <p>12 submitted on _____ to the</p> <p>13 Witness or to the attorney for the Witness for</p> <p>14 examination, signature and return to me by</p> <p>15 _____;</p> <p>16 That the amount of time used by each party at the</p> <p>17 deposition is as follows:</p> <p>18 Mr. Mark D. Bankston: 6 hours, 24 minutes</p> <p>19 Mr. William R. Ogden:</p> <p>20 Ms. Jacquelyn Blott:</p> <p>21 That pursuant to information given to the</p> <p>22 deposition officer at the time said testimony was</p> <p>23 taken, the following includes Counsel for all parties</p> <p>24 of the record:</p> <p>25 Mr. Mark D. Bankston</p> <p>Mr. William R. Ogden</p> <p>Ms. Jacquelyn Blott</p>

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1 I further certify that I am neither Counsel for,  
2 related to, nor employed by any of the parties or  
3 attorneys in the action in which this proceeding was  
4 taken, and further that I am not financially or  
5 otherwise interested in the outcome of the action.

6 Certified to me by this \_\_\_\_\_ day of \_\_\_\_\_,  
7 \_\_\_\_\_.



LOGAN KISLINGBURY, Texas CSR 11388  
Expiration Date: 3-31-2022  
Res Ipsa Litigation Support, LLC  
Firm Registration No. 11371  
501 Congress Avenue, Suite 150  
Austin, Texas 78701  
Tel: 512.334.6777

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## FURTHER CERTIFICATION

1 That \$\_\_\_\_\_ is the deposition officer's charges  
2 to the \_\_\_\_\_ for  
3 preparing the original deposition transcript and any  
4 copies of exhibits;

5 That the deposition was delivered in accordance  
6 with Rule 203.3, and that a copy of this certificate  
7 was served on all parties shown herein on \_\_\_\_\_  
8 and filed with the Clerk.

9 Certified to by me this \_\_\_\_\_ day of \_\_\_\_\_,  
10 \_\_\_\_\_



Res Ipsa Litigation Support, LLC  
Firm Registration No. 11371  
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Austin, Texas 78701  
Tel: 512.334.6777





	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
		Dan Bidondi	Wolfgang Halbig	FOIA HEARING in Newport, CT	
2/18/2014	School Shooting Expert Threatened Over Sandy Hook Investigation	Adan Salazar			American Free Press
					Newtown School Board Meeting 05/06/2014
	Interview with Norm Pattis (Epstein)		Norm Pattis		Legal Top Gun - Newsday
1_1000-Infowars Wins Sandy Hook Appeal Request	Schumer got thousands in donations from Jeffrey Epstein 07/10/2019	Nikki Schwab			Metro
	Video		Secretary of State Alex Acosta		
	Facebook: Updates Deletes Policy Allowing Violent Threats Against Dangerous Individuals (July 10, 2019)	Paul Joseph Watson			
	Connecticut News: current.com				
	Hartford Courant; Connecticut Supreme Court Agrees to hear appeal in lawsuit by Sandy Hook parents against InfoWars broadcaster Alex Jones (July 10,2019)	Dave Altimari			Hartford Courant
		Rob Dew			

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
4T8_WYzH SS	"We Need to Talk about Hook", and it is noted in the documentary that he is also the chairman and CEO of Traxware, "a company that specialized in removal of internet slander, internet defamation, bugshots, defamations of character and online public records."				
12/12/2014	Independent Media Solidarity (Tyranny News Network)(mediasolitary.com)		QKUltra and Tyranny (Anonymous). Their source was Mr. Stosh 314 (Youtube handle)		youtube.com/qkult ra; insanemedia.net- reporter "Swan Song"
					CNN interview with Robby Parker
	"Sandy Hook Documentary Phenomenon, the Fortress and What's Inside"		QKUltra		
					Youtube source SherryQuestionin g All
	Special Report: Why People Think Sandy Hook is a Hoax (January 27, 2013)				InfoWars.com
			Wolfgang Halbig		
					Professor Noom; FreeRock Revolution' UpNorth of the 49th
5dl79t7Mrw	Interview regarding the FOIA Hearing	David Knight	Wolfgang Halbig		



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
6w6b	"I have looked at the evidence and I firmly believe there was a second person.	Rob Dew			Video Connecticut State Police News Conference: Lt. J. Paul Vance
	<i>Facebook Suspends Account for Questioning Official Narrative on Shooting (December 18, 2012)-- Account was suspended for a photo of Adam Lanza questioning whether the official narrative that he was a 20 yr Autistic kid who never shot before (we're not sure about that) a gun but then kills people with accuracy and people blindly believe it.</i>	Paul Joseph Watson			Facebook
	<i>Misidentification of Ryan Lanza</i>				
	<i>Second Connecticut School shooter suspect in custody</i>	Matt Bushey, Digital Designer/Producer			Fox42 Central Pennsylvania (WSFB) "second CT school shooter suspect in custody." Article goes on to quote a witness who said that they saw a second man in custody who was taken out of the woods in camo and telling people at scene "I did not do it."

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	<i>Evidence of 2nd and 3rd Shooter at Sandy Hook</i>				At 6:20 cut to aerial footage of cops fanned out in the woods.
	THERE WAS A MAN WHO WAS ARRESTED IN THE WOODS BUT NOBODY EVER HEARD ANYTHING ABOUT HIM.				
7CfulOdisU M	(What Went Wrong with the Shooter in Newton, CT)	Aaron Dykes	Charlotte ISERBYT		<u>The Deliberate Dumbing Down of America</u> , by Charlotte Iserbyt
12/22/2012	<i>Creating a Shooter</i> (December 15, 2012)				lowtechgrannie
	"School Choice/Charter Schools will Kill Private Education				deliberatedumbingdown.com
	americandeception.com				americandeception.com
	<i>Carnegie Corporation: Conclusions and Recommendations (1934)</i>				
	<i>Project BEST: Better Education Skills Through Technology</i>				US Dept of Education
	<i>Conclusions and Recommendations for the Social Studies</i> .				americandeception.com
	Bill and Melinda Gates: Corporate Facism				
	Austin Charter School: Local school was killed. Know nothing about education. Another hispanic school was gutted of books, etc...and computers were put in. Money that used to go to school districts is now going to be going to follow the individual child (in Texas).				



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	ELDERLY LADY WHO WAS IN EDUCATION UNDER REAGAN. INTERVIEW ABOUT HER BOOK. TALKS ABOUT PUNISHMENT AND REWARD. CHILDREN HAVE HAD THEIR VALUE SYSTEM COMPLETELY SCREWED AROUND. Federal funding is a nightmare for education.				
8cZkH16nQ	Town is in shock. He was a Cub Scout leader. Wife involved in the school. One of those killed was previously son's tutor and was a really good girl. Son loved her. She saved a lot of people.	Alex Jones	Tim, who lives down from the school. His daughter previously attending Sandy Hook		
12/19/2012	Media and all their trucks and satellite dishes are all there. Alex, "I think they're like Vampires. They're there to suck every bit of pain they can out of the parents. The parents have said that they are sick of them stalking them." "Is the official story accurate?"				
	Victoria Soto, Amazing Heroine of Sandy Hook (December 15, 2012)				The American Sentinel
	"Man arrested in woods, handcuffed in police car and you never hear anything about it anymore."				Tim
	Alex, "They are not letting a horrible situation go to waste." Obama fake cries.				
	FBI New Number Sheet on Violent Crimes - 2007-2011. 20% Reduction				Professor Lot
	"Gun Sales Surge After Connecticut Massacre"				
A2ZOzUzBn7k	Shocked about the horrific events that took place at Sandy Hook.	Jakari Jackson			

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Lanza's dad said video of person entering building should not be shown.				
	Believes that the incident Happened and I do believe people died there that day				
	<i>FBI Says No One Killed at Sandy Hook</i>				Image: Wiki Commons
	Zero murders in Newton, CT. He does believe that the incident happened. "Maybe it's a typo." Suspicious.				fbi.gov
	Halbig coming on later in the week				
	Discussed bills regarding gun control and the requirements to get your CHL.				Adan Salazar article re: FBI crime statistics
AfvhhcXPCps	<b>Special Live Report:</b> 40 plus page latest lawsuits against InfoWars				
5/23/2018	Clinton: Trump Refuses to Condemn Racist Remarks				Fox Business
	Clinton: I inherited nothing from Democratic Party				CNBC
	<i>Six More Families Sue Alex Jones over Sandy Hook Conspiracy Claims</i> (Brandy Zadrozny, May 23, 2018)			Brandy Zadrozny	Peacock news
	<i>Families of Sandy Hook victims, FBI agent file defamation lawsuit against right-wing radio host Alex Jones</i> (Aaron Katersky, May 23, 2018)			Aaron Katersky	ABC News
	<i>Sandy Hook Parents Hit Alex Jones With Defamation Lawsuit</i> (Sebastian Murdock, April 17, 2018)			Sebastian Murdock	Huffington Post
	<i>Alex Jones sues by more families over Sandy Hook hoax claims.</i> (Ruth Brown, May 23, 2018)			Ruth Brown	New York Post
	<i>Families of Sandy Hook Victims Sue Infowars' Alex Jones.</i> (May 23, 2018)				Associated Press



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	<i>More Sandy Hook Families, FBI Agent File Lawsuit Against Infowars' Alex Jones.</i>			David Altimari	Hartford Courant
	Alex, "My listeners saw some of the anomalies. A lot saying it didn't happen. We looked at both sides. A couple of years later, Wolfgang and others getting mad at me...I'm done with this. I did not say that people didn't die. Wolfgang does not work for us. The lawsuit is bizarre. I said people died at Sandy Hook				
	<i>Truth in a Post-Truth Era: Sandy Hook Families Sue Alex Jones, Conspiracy Theorist (May 23, 2018)</i>			Elizabeth Williamson	The New York Times
	"I ask the families of Sandy Hook victims to actually admit that I have invited you on for years and admit that I have said for years that it really happened, and if I have caused you any pain by debating both sides of it I am sorry for your pain, but this is a big public event that has been seized on politically to take our rights,' Jones said." (May 23, 2018			David Altimari	More Sandy Hook Families, FBI Agent File Lawsuit Against Infowars' Alex Jones. , Hartford Courant (May 23, 2018)
	Megan Kelly totally edited the interview making it seem that I said things I did not say?				
	The media keeps misrepresenting what I have said.				
	<i>Summons ; Connecticut Suit</i>				
	<i>Connecticut PD Has FBI Falsify Crime Statistics Alex Jones Channel. September 25, 2014), "This was the last time I spoke with Halbig."</i>				
	<i>Sandy Hook: The Lies Keep Growing - Infowars Nightly News - 05/28/2015)</i>				24:00:00



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	<i>School Administrator Exposes Sandy Hook Stonewall (May 29, 2015)</i>				
	<i>New Sandy Hook Questions Arise from FOIA Hearing (May 29, 2015)</i>				
	I have never said it didn't happen. I have hosted debates on whether or not it happened.				
	<i>Alex Jones and Lawyer Respond to Sandy Hook Show Trials</i>	Alex Jones	Robert Barnes		
?	<i>New Defense Lawyer Switches Strategy in Alex Jones Case (</i>				Austin American-Statesman
2019	Is there a zone of danger? Press cannot comment and say anything? Certain subjects taboo?				
	<i>CNN Cries "Racist" After Tucker Carlson's Ratings Higher than its Entire Prime Time Line Up (April 4, 2019)</i>				Steve Watson-Infowars
	<i>Tucker Carlson Beats CNN's Entire Line-Up Combined, So Now CNN Targets his Advertisers (April 3, 2019)</i>				Paul Joseph Watson
	<i>CNN Host Says, "Lock Her Up" Chants Should Have Been Shut Down For "Hate Speech." Christiane Amanpour wanted FBI to silence Trump Supporters (April 2, 2019)</i>				Paul Joseph Watson
	<i>The Comey Interview: Comey on Trump's Threat to Investigate the Investigators</i>				CNN Live
	<i>Tells employees to call he doesn't text.</i>				
	<i>In Defamation lawsuit, lawyers for Sandy Hook families accuse Alex Jones of More Stonewalling. (April 2, 2019)</i>		Dave Altimari		Hartford Courtant
	"Direct from my brain to the listeners."-- AJ				
	<i>Alex Jones' Official Statement on Roku Ban and Sandy Hook</i>				



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Reads from a Washington Post Article (day of broadcast)				
	<i>Roku defends hosting InfoWars</i>				
	The democratic party chose to make SH and statements about it their centerpiece of the campaign. Hillary Clinton and media twisted and exaggerated what was said. It became mythological.				
	"I have been typecast. Labeled the SH denier"				
	SH is less than .01% of what we've covered within the first 4-5 years. In the following 3 years, the media began to hype to get people to not listen to him on a host of other issues.				
	False flags- internet questioned SH and looked at anomalies. Taken out of context.				
	Some of the investigators were so cooky and so aggressive, so he couldn't say it was false.				
		Alex Jones	Robert Barnes		
	<i>Bill Maher Mocks "Chef Boyardee" Red State Voters, Says Blue States for Rich &amp; Educated (February 23, 2019)</i>			Bill Maher clip interviewing	The Alex Jones Radio Show
Bfy		David Knight			
	<i>Police are Using Social Media Posts to Determine "Threat Score" of Suspects (December 16, 2014)</i>			Paul Joseph Watson	InfoWars.com
	<i>Police Union Caught Putting GPS on Rival Polician's Car and Framing him for DUI (December 14, 2014)</i>			John Vibes	TheFreeThoughtProject.com
	<i>L.A. Times: Vivek Murthy's Confirmation Meands Guns Now a Healthcare Issue"</i>			AWR Hawkins	L.A. Times
	<i>Washington State Pro-Gun Rally Draws Thousands (December 15, 2014)</i>			Bob Adelman	



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	<i>Spokane Police Department Faces Protest Over Sheriff Deputy's Shocking Comments</i> (December 16, 201)			Paul Joseph Watson	InfoWars.com
	Anomolies about SH noted by Halbig. One of the things that was unusual about it was no lawsuit.				
	<i>Sandy Hook Families to Sue Bushmaster</i> (December 15, 2014)			Dean Garrison	
	<i>Newtown (sic) Families Sue Gun Maker for Sandy Hook Massacre</i>			NBC News	
	<i>Police: Armored Military Vehicles Needed for 'Constitutionalists' with Firearms</i> (December 14, 2014)		Mikael Thalen	InfoWars	
	Caller Max in Ohio- Bushmaster should hire Halbig. Caller thinks that Halbig has pointed out good things. When they sue the company, theydon't have to go into the detail of the incident as much. With this, allows an end-around around the details of SH. Ingenius strategy.		Max in Ohio		
	<i>The Ultimate Sandy Hook Debate as the 2nd Anniversary Looms</i> (December 12, 2013)	Owen Shroyer	Wolfgang Halbig/Keith Johnson (American Free Press)	InfoWars	imbedded in interview. Article
	<i>Magic Bullet: DOD Wants Bullet That Can Change Directions After Being Fired</i> (December 15, 2014)			Matthew M. Burke/Stars and Stripes	
	Caller: DavidCarlsonFund.com				
	Caller Wayne in Texas. Sandy Hook Families Suing Bushmaster			Caller Wayne in Texas	
	Black Lives Matter_Inside Secrets Exposed by Top Lawyer	Alex Jones	Robert Barnes		InfoWars.com
BwsBy	Re: Second FOIA Request by Wolfgang Halbig		Rob Dew		InfoWars.com



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	"no check in list per 'Everyone Must Sign In' sign"				
	"Gene Rosen Conforted CT Students he Found in Driveway"				FOX News
	Video of 2nd FOIA Request hearing in Sany Hook [Homeland Security Must have it]		Owen Shoyer		
	clip of Dan Bidondi interviewing Owen's Uncle at the hearing.				
	clip of Connecticut State Police News Conference (same as above)				
	Owen: "Wolfgang was initially investigating to see how we make sure this doesn't happen again."				
D8GxrK	"Professor claims SH massacre MSM misinformation"	Owen Shroyer			James Tracy
	<i>James Tracy on KPFA's Guns and Butter</i>				memoryhole.com
	<i>Newtown official furious after Florida professor makes outrageous conspiray claims saying that Sandy Hook shooting may not have happened. (January 10, 2013)</i>				Mail Online
	<i>He's not saying that it didn't happen, but that it didn't happen in the way the media portrayed it.</i>				
	<i>FAU prof stirs controversy by disputing Newtown massacre . (January 7, 2013)</i>			Mike Clary	SunSentinel.com
	<i>The Sandy Hook Massacre: Unanswered Questions and Missing Information</i>			James Tracy	memoryhole.com
	<i>Sandy Hook School Massacre Timeline (January 6, 2013)</i>			James Tracy	memoryhole.com
	Photo of children being led out of School with article			Shannon Hicks	The Newtown Bee
	Clip: Evidence of 2nd and 3rd Shooter at Sandy Hook.				
	<i>Sandy Hook gunman Adam Lanza shot his way through school door. (Monday, December 31)</i>				The Times



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	<i>Analyzing the Newtown Narrative: Sandy Hook's Disappearing Shooter Suspects</i>			James Tracy	memoryhole.com
dWJph.		Alex Jones			
	<i>Boy Scouts to provide condoms at upcoming World Jamboree</i>				The Washington Times
	<i>Alex Jones thinks these documents prove the CIA is making you itchy (May 22, 2018)</i>			Joshua Eaton	ThinkProgress
	<i>Trump's Cozy Relationship with Conspiracy Theorists</i>				InfoWars.com
	<i>Trump Returns to LI today to talk about MS-13</i>			Laura Figueroa Hernandez	Newsday
	Clip from the Political View			Joy Baher	The Political View
	<i>SPYGATE could be one of the biggest political scandals in history (May 23, 2018)</i>				Donald J. Trump@realDonaldTrump
	<i>Trump: Criminal Deep State Caught up in Major Spy Scandal . May 23, 2018)</i>			Steve Watson	InfoWars.com
	WITCH HUNT (May 23, 2018)				Donald J. Trump@realDonaldTrump
Shroyer Depo Ex9 video re: Heslin	"I don't know if Alex even know about this." Megyn Kelly fails to fact check SH father claim re: holding his son. "This broke today."	Shroyer			ZeroHedge (ZeroPointNow)
	To Megyn Kelly or Heslin to explain the "contraction."				Video clip from interview with Heslin-- Megyn Kelly Show
	"Vivid in his memory." Just more questions from conspiracy theorists.				Video clip from interview with Carver

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Clarification from Heslin or Megyn Kelly? I wouldn't hold my breath.				
AJ responds to SH child pornography Set up	truth is weapon but losing financially. Speech under attach-- Orwellian. When is the right time to say we're sinking?	Alex Jones	Norm Pattis		
	On 6/14 I had a real meltdown on air and I apologize.				
	At end of 4 hr broadcast got angry because found out that FBI has been investigating them for kiddie porn for 2 weeks.				
	Million dollar reward clarification.				
	FBI said that Infowars is the victim, but whoever sent this, that shows the insanity.				
	Gooleanalytics show less than .02% on SH on the show.				
	Threatening over SH and it was unopened to set them up.				
	Correction-- \$100k for information on who sent that.				
	Norm didn't want some part of the reward contingent on the outcome of the case and so would have an interest in the outcome.				
	Halbig raised 16 questions/anomolies. It's not a crime to ask questions.				
	Suggestion that it didn't happen is outrageous but have a right to say that.				
	No one at Infowars had any knowledge of the emails. They were not opened. Video or pdfs.				
	upset at Chris mattei who is a former federal prosecutor.				



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	There is no marketing plan or secret sauce.				
	Secret group gives a rating which other uses to ban you.				
F2mru	Tears in eyes more like get ready and watch your 6. Angel of death flapping around.				
12/17/2012	Prayer.				
	Democrats murdering people everywhere- force people to have abortions, Apple factories where they do forced abortions but lecture him about caring for children.	Alex Jones			
	Republicans fool us to make us think there is opposition so we don't get involved. Compromisers.				
	death of 20 kids on SH-- never felt anything close to this. Gut feeling and can't control it. 10 or 20x anything I've ever felt.				
	Repent for abortions and all the bad things we've done and open their eyes and stand up against evil.				
	Wicked dem operatives are.				
	Cut to FEMA not being able to help people when natural disasters happen, and ad to preparedness items.				
	10:24 back.				
	Youtube video- "SH in batman movie! Another reference to mass shooting."				
	Play clip of Batman movie-- Sandyhook on map.				
	13:44- cut to video montage.				
Fus1f	Doomsday 2012- 12/22/2012 end of worlders call NASA.	Jakarri			
12/21/2012	1:50- Confirmed sections of Gotham renamed "SandyHook"				

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	One of researchers came up to him and asked him what he thought and he was skeptical but then he was shown the still from the movie.		Link to infowars.com article by Adan Salazar re: Batman		
	May be more than a coincidence.				
	Put up map of what Gotham looked like in First batman movie.				
	Then put up what it's called in the latest movie.				
	"tricornet" - movie "Gothamknight" as a bridge between movies.				
	Tricornet replaced with Sandyhook.				
	4:44- Quote of the day from most recent batman movie "Not allowed to believe in coincidences anymore."				
	Cut away to infowars video Merry Christmas to the slaves from the fed.				
Gmgdn	Many incidents of gov't staging events. Right to question any big event especially when it's used to justify gun rights.	Alex Jones			
4/17/2018	I questioned the talking points around the SH massacre. Very quickly, came to believe that the massacre happened and was a police standdown of Lanza. And the media diverted off into the hoax argument.				
	I had both sides of the argument on and played devil's adovocate. Media gave short clips out of context to decieve. If you look at what I really said and realized I was having a debate.				
	Lawsuits filed by democratic connected firms. Parents are roped into this as victims. <b>Been saying for years I believe their children died.</b>				



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	I believe your children died, I didn't kill them and gun owners did not kill your children.				
	Baby and incubator claim again, fake WMDs, hillary being given the questions before hand.				
	Bloodthirsty media and corporate gov't. What pressure are parents being put under.				
	SH happened and early on was being bullied by ppl on internet to say noone died and when wouldn't say that, they would say that AJ was a gov't agent and AJ was a crisis actor, claimed that he was Beau Bridges, and an actor covering up SH.				
	Dem were ready that day. Just like in Parkland, cops stood down.				
	When said Aurora was staged-- he said he was under mind control and cops stood down.				
	Have invited SH parents on the air. Sorry for pain but this is a public event seized on to take our rights. Being targeted.				
	Been clear for years and years but MSM misrepresented his positions.				
Google Analytics prove no SH marketing	AJ says we barely covered it over the last 7 years. Articles about SH accounted for .02% of traffic to website since 2012.	Alex Jones	Michael Zimmerman		
	They make me cover it.				
	Zimmerman helping comply with discovery.				
	Keep going to Judge up there and asking for Marketing on SH.				

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	They know our marketing is whatever the specials are in the plugs.				
	3:00- document cam shot to binder and manila folder to ad marketing.				
	Google ads at one point.				
	Judge agrees AJ covering up "SH Bonanza"		NewsTimes Article- New trouble for AJ in court fight with SH families.		
	Never run a paid report with Google. Impossible order.				
	Claim is that it's \$100k to run a basic report.				
	Number of users and graph of traffic by day.				
	Can ask for specific reports, but they have not.				
	AJ never asked for a report.				
	Report search for SH- of all the traffic, articles about SH account for .02% of traffic.				
	Ad to Space Force apparel.				
h90t	12/14/2014- Plastic guns, Guy Fawkes Masks.	Jakarri Jackson	Breibart article- "Mother of SH victim: background checks would not have prevented."		
2/5/2013	SH- background checks would not have prevented tragedy.				
	Stole gun from legal gun owner.				
	3D printed gun ban from Congress.				



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
Howard Stern mocks dead SH children	Mancow.com.				
	1:05- Birthday Shoutout, young crisis actor victim in SH shooting.				
	2:00- Discussing Muslims.				
	Something about raping corpse on day of father's funeral and used mom's saliva. Ugliness.				
	Mixing with what they say with comedy and news. They're just mean.		Gainsville.com "Howard Stern and Free Speech" Not after today"		
	AJ is a unified front of fraud.				
	Lizard people are the retilian elite, CIA.				
	9:25 Birthday time: 13th birthday young SH crisis actor.				
	He's making fun of dead kids and pretending that I did it.				
	Stolen my identity and in my name saying things I never said.				
	Other radio hosts making fun of Alex Jones.				
	Howard Stern someone pretending to be AJ.				
kk8c	Female caller- what's going to happen in 2015 re: lawsuit against gun manufacturers. That should open up discovery of how fake it is. Caller talks about movie Runaway Jury.	Alex Jones			
12/27/2014	2:46 refer again to FBI statistics that report 0 murders in Newtown in 2012.		Guest: Doug Hagman		Article by Adan Salazar re FBI statistics



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	What do you think about Halbig? Successful school safety guy, wrote the book on it.				
	Saw kids doing circles in the parking lot, people in anti-terror outfits in the woods, then denied that was in the news.				
	"Something's being hidden there."				
	"What do you really think happened?" -- AJ				
	Hagman-- I don't know, but the official narrative is not what really happened. Behavior of coroner struck him.				
	Blood splatter analyst himself and never saw anything like that				
	"Pilot" possibly, <b>not saying it didn't happen, but didn't happen the way they said.</b> Manipulate news coverage. Practicing how to propagandize and put out a product that is a fraud. Heavy scripting, parents laughing.				
Lawyer breaks down the real SH conspiracy	2/23/2019- not just 2nd amendment, but 1st amendment.		Attorney Robert Barnes		
	ever since trump elected, try to shut up conservative voice. AJ's voice and audience right to access his voice. Want audience to be afraid of listening to him.				
	Lawusit's goal is to deplatform him. Suits on behalf of people who don't claim they were ever ID'd by name.				
	ACLU admits it is a campaign to silence.				

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Built straw man- saw in Ralph Nader case. The parties got together to coordinate an attack on Nader. Coordinate legal actions and trying it in court of public opinion.				
	Same modus opperandi-- false and defamatory story and then coordinate legal strategy three diff cases in three diff places.				
	Use existence of lawsuit to deplatform to third parties.				
	All "fake news" is anything they disagree with it.				
	discovery- use legal process to get information				
	did this guy really just cite to GIRSOWOLD V CT which guarantees right to privacy in ABORTION cases!?!?!?!?				
	get info on people who listen to him.				
iomi4	Updates in SH case.	Rob dew			
	FOIA hearing with Halbig.				
	Second hearing-- First Selectwoman re: check in signs.				
	Photo of Gene Rosen with check in sign in the background.				
	Clip from second FOIA hearing.				
	Town didn't put sign there, who put it there? First Selectwoman believes it was homeland security.				
	In History of Homeland security they have never been involved in a school shooting.				
	Vouching for credibility of his uncle who attended hearing-- he's not getting paid by anybody to check this out. Own curiosity				
	Interview with uncle by Dan Biondi afterward saying it was very strange former Navy SEAL, naval academy.				



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	4:00- makes claim that there are no permission slips to take the SH choir to the superbowl, relating back to the superbowl photo claim by Halbig.				
	4:26- cut back to FOIA hearing re: porta pottie claim. Circle still photos of protapotties at the school. 'portapotties magically appear."				
	again claim couldn't get ambulance in but could get portapotties in.				
	5:58- These people are lying blatantly on the stand. "Dazzled."	Dan Biondi			
mh6h	Video footage of Halbig trying to get into United Way with police presence.				
5/13/2014	Cut to first FOIA hearing.				
	Repeats some of his 16 "questions."				
MSM use Shto cover up gun control agenda		Alex Jones			
	trump's tweet re: twitter better watch it.		Robert Barnes		
	Trump tweet 6/9/2019 re: twitter banning ocnervative voices.				
	Matt Bracken- expert on Iran. Believes Iran is behind attacks on ships.		News wars article: Iran admits to bombing ships, vows more terror attacks.		

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Former US attorney appointed by obama brought down governor of CT.		Newstimes article: new trouble in court case against SH families		
	Discussing ruling from previous day about google analystics.				
	We're not experts in marketing, we're experts in organized crime.				
	8:58- everything at the show is focused on ideas and sharing/spreading ideas.				
	9:23 he's been over paying his taxes like an idiot.				
	Never did product studies.				
	Everyone is sick of SH. In comparison, videos are not performing as well as others.				
	11:15 google tracks a video range of data for their purposes and google only provides it to people on a limited basis.				
	deliberate attempt to decieve the judge.				
	Instead of focusing on school safety, focusing on gun control				
	24:44 Shroyer-- your leaders Pelosi and Nadler are struggling (clips of the two of them looking dehydrated and grasping for words and use this as an ad for "brain force plus.")				
MSM Uses tragic suicide of Sh to smear AJ	Very sad. It's the corporate media that says it's the worst thing to question a mass event. Then use my name to bring out hurtful stories.				News Channel 3 clip of coverage of the suicide.



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	being used to attack 1st amendment. Dems believe that AJ got trump elected. We're mom and pop.				NH Register- SH dad kills himself as defamation suit continues, 3/25/19
	Shot himself in front of the town hall. How do I get a fair trial with stuff like this? I've never said this guy's name.				NY Post: Father of SH victim Avielle Richman dead of apparent suicide, 3/25/19
	Is there going to be a police investigation? Are there surveillance cameras? SH thing is getting crazier.				
	People suspicious when media blamed all americans for what happened. Pray for family of this poor gentleman.				
	Article after article and you read them and it's about me, with my face-- photo of AJ.				Westportnews: "AJ and Jeremy Richman:SH dad kills himself as defamation case continues."
	Doing my apology tour for years. Dealt with some of these crazies. Can't get the families and lawyer to stop saying I'm currently doing it and that way it is a clear and present issue.				
	he's one of many people suing me that I've never said his name.				
	13:39 cut to a news broadcast on news channel 3.				

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Created avielle foundation focused on preventing violence. Had an office at the town hall where he was found. People involved with Parkland had just committed suicide in the past week.				
	Corporate media is the one who says it's the worse thing to question a mass event, then use my name to bring out the hurtful stories over and over which causes copy cats to do it more.				
	Don't know if he took his life but that's what it's leaning towards, very sad and bizarre.				
	Going to send cease and desist letters to media outlets, that you know it's been years and years of me saying it's staged. They would clip what he said out of context and replay it and claim he's currently doing it.				
	ad to products				
	19:45 they thijnk, not sure a suicide, at the community center. Turn internet on and the articles link back to AJ.				
	That's what they do, they decieve. Twilight zone.				
	Good guy- foundation for mentally ill people which makes sense bc of Lanza.				
	Parents are good people, let's pray for them.				
New SH hoax Launched by AP	Scope of 1st amendment and will be seminal case.				
	Had initially waived attorneys fees but they keep filing more and more suits so not going ot be able to do that.		Robert Barnes		
					AJ seeks \$100k from SH families



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	This article says that AJ wrote a book with Fetzer that I never read.				Father of SH victim wins defamation lawsuit against AJ- AP article
	Declare I lost to scare everyone.				
	SC of CT got involved with public interest appeal.				
	Political objective to scare people from listening to him.				"Jones Loses TX appeal in ongoing lawsuit with SH" Ethan Fry
					"Infowars loses appeal in SH defamation lawsuit." Jared Holt 9/4/19
	WAP0, Nytimes all saying we're ending 1st amendment using Jones we don't need it anymore.				
	AP refuses to retract the story.				
	8:40 after break				
	17:30 ad to end.				
nwcc	Weinstein is a monstrous pig. Clips of Weinstein.		Mark Randazza		Nytimes "Truth in a post-truth era: SH families sue AJ, conspiracy theorist."
5/25/2018	1st amendment lawyer. SH latest rounds of suits. Legal commentary- look at a complaint with 394 paragraphs, the facts are relatively simple. Logical contortions.				CNN- "6 more SH families sue alex jones," Aaron Cooper, 5/24/18

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Implausible conspiracy among you and the viewers.				
	added 1 defendant in CT, diversity of citizenship for federal jurisdiction. Don't want to be in federal court bc perceived to be more defendant friendly.				
	CT judges are appointed for 8 years, and can be reappointed and so if politically charged, more likely judge won't make a politically unpopular decision.				Infowars: "AJ statement on new SH lawsuit" 5/23/18
	Federal judge is lifetime appointment.				
	Streisand effect				
	Can't discount actual people's feelings but some of this is outside SOL (2 years in CT).				
	The cherry picked statements are out of context.				
NY Times releases bizarre SH 2nd shooter story	Video clip of one of the depositions of AJ. Left hates America. Clip from a 3 hr 40 min depo in SH, and what they chose to attack me on was things we legitimately questioned but when read the article, Alex is a consolation prize, but at least we're destroying AJ.				NYTimes Magazine: "AJ under oath is antidote to a 'post-truth' age."
	#resistance consolation prize. "Post truthification"				
	Goes through article which claims AJ says SH is a hoax contrived by victim's parents. Never said that.				
	Symbol of victory for the left.				
	Put up a 3 min clip of the depo-- pinned down				
	Does the Nytimes claim they didn't run a story about 2 shooters or a man arrested in cammo?				
	Coverup of the slow police response and SH vampires are the lawyers.				



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	8:22 If you crossed Golum with a lawyer you would get Mark Bankston.				Business Insider: "Footage of police arresting second man in woods right after SH shooting." Michael B Kelly 12/17/12
	Months later worried about a second shooter targeting the families.				AP video aerial footage of people mrunning in woods
					Audio of interview with witness claiming to see police walk a guy out of the woods and put him in the police crusier.
					WCCC600- live news broadcast. "Two shooters is this the latest?" Mike Bellamy
					Local Newtown Beat- Police Union Seeks funding for trauma treatment. A man with the gun that was pulled from the woods was a SWAT officer from another town.

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Drills they were running that day.				<i>Skeptoid Blog:</i> "Terror attacks and drills: coincidence or conspiracy?"
	Audio of deposition where Bankston accuses him of making this up.				SH DA cites potential "suspects" fears witness safety. February 2013.
ogpw	Experience as educator and law enforcement and school safety consultant.	David Knight	Wolfgang Halbig		Halbig's site-- schoolsafetyinstitut e.com (shows summary of his experience)
2/20/2014	Halbig runs the child safety institute (CSI). Here he says he was a US customs agent, but other places he said he's former FBI.				Daily News article: "Social media users spreading false information about SH massacre could face charges, say police."
	Appointed by Jeb Bush to be on school safety commission.				Cut to article by Adan Salazar 2/14/14 re: Halbig being "threatened" over SH investigation
	Working on this for over 10 months through FOIA process but then intimidated him.				



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	If they wanted to make schools safer, they would have an open transparent conversation about what went wrong.				
	Second visit from law enforcement. Must be listening to AmericanFreePress				
	6:11 Knight alleges that Obama does stuff like this against his political enemies by sending the IRS to attack them. Want to intimidate people.				
	Deputies said Newtown Police want to know if you own a handgun.				
	Want to make all guns dangerous to people and if gunowner DHS is training everyone to think you're a terrorist.				
	8:00 portapotty allegation. W/in 3 hrs. Who is thinking about ordering those that morning? Called the company who ordered them and when? Secretary refused to give info. Portapotties are confidential? The next morning a Southbury PD called and told him to stop harassing the portapotty company.				
	Everything is a top secret state secret.				
	9:36- asked about his biggest "red flag."				
	"Clock starts ticking" 9:35 shots fired. First 10 minutes, neutralize the threats. These cops parked .25 mile away and come through the woods.				
	No Trauma helicopters?				
	11:35; so many false flags, more concerned about portapotties than EMS services. Delivered on golf carts.				

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	12:10- Says he went to a store and randomly asked a lady behind him whether she had heard of SH and whether she believed children actually died that day.				
	"I think this is the biggest hoax that FEMA and DHS has ever done against American people."				
	Instantly matches their agenda and then so many things start to surface.				
	Biggest red Flags? Who didn't order the helicopters? Who made a decision not to let EMTs inside school.				
	Columbine first time SWAT came out and said I made a mistake.				
	14:50- body count within 11 minutes? Who declared them legally dead?				NY Times: "2.53 million deal ends some columbine lawsuits" 4/20/01.
	No lawsuits from the parents.				
	16:19- why does it take 4 hrs to find a RN in the front office?				
	"That's what we see with the events that are typically false flags."				
	It was an illusion. Put puzzle together.				
	What do you hope to accomplish in Newtown? Want to have a convo with the school board members.				
	Who is the surveillance contractor that installed the security system?				
	Who is the surveillance contractor that installed the security system?				
	Which environmental company did they contract to clean up the biohazard?				



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	"you did this because that's your profession"				
	One that really sticks out, listen to the police transmission, at 9:55:31am officer who is inside the school and says "multiple weapons, rifles and a shotgun." Where's the shotgun? He was in room 10 where supposedly Lanza committed suicide.				
	Video footage of them pulling shotgun out of the trunk so wasn't in the school.				
	"Whoever directed it and created a script it was a 2-3 year project."				
	This isn't the first time they've done a false flag, many different areas. Some executed some not. We've seen it over and over again in history and our government is a master at it.-- Knight				
	SH justice trust fund to fund Halbig.				Facebook- Wolfgang W. Halbig
	"Man of integrity who is imminently qualified to do this type of investigation."				
oo74	Sandy Hook AR15 hoax? Still no school surveillance footage released?				Article- Mike Adams, Natural News, 1/14/13
1/15/2014	Maybe AR15 was not used, but a handgun.				Matt Lauer
	Cited a Matt Lauer piece saying that officials were sayign AR15 not used.				
	This would debunk allegation that AR15 was used so we need a ban on Assault rifles.				
	Doctoring the video?				

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Rob Dew- testimony that someone had seen another individual next to the school in cammo with a gun, police questioning him but no one knows what happened with him.				
QjjC	2hrs 48mins long				Jamie White infowars.com "Nojoke: Judge who forced cohen to ID hannity performed Soros wedding."
	Two more lawsuits filed yesterday. Two lawyers told me frivolous.				Kimba Wood: 5 Fast facts you need to know 4/17/18
	I can't 100% say kids didn't die there but there are people out there who believe it.				Judge in Michael Cohen's case officiated Soros Wedding- Jeff Murdoch, WATimes
	False flags- gov't has done it before. Right to investigate it.				Bloomberg Politics- SH Families Sue infowars' AJ for Defamation, Polly Mosendz, 4/17/18
	About 1 year after SH I said you know I think people died there and pulled back because some groups out there were even saying he was other people.				VICE Hit piece: Infowars started Parkland 'crisis actor' conspiracy. 3/29/18



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Last April visited by Megyn Kelly and after interview aired on father's day I watched one of SH parents say I said no one died there, despite that I've said for 3 years before that that ppl died there.				AJ Files lawsuit against Georgetown U School of Law. 4/12/18
	Reference Wall Street Journal article allegedly saying "we have a formula to shut Alex Jones down."				
	Talking about slavery and how people alive today aren't related to people alive today who had slaves.				
	"Exploding tire lawyers."				
	Went and watched the videos and what they say we said isnt there.				
	Invited them on the show.				
	Cut to "Final Statement on SH" Published 11/18/16 on Youtube.				
	AJ is being called a crisis actor himself, called him Beau Bridges.				Wikipedia: "Tar baby" definition
	Tried to host debates with both sides. Think there's holes in your arguments.				
	Hillary faking stuff, people don't believe anything anymore and they think I'm in on the deception.				
	14:10 break, switch topic of conversation to the Judge in Michael Cohen's case.				
	At 20:25 pivots back to the lawsuits against him and the collusion of the media and the lawyers.				
	22:30- break. Comes back on and talks about Judge.				
	26:19- don't think parents at SH were actors.				
	Go after these people- report it,. Lots of politics including war, Hillary, Trump, abortion				

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Video of blind woman dumped draino in her eyes.				
	"Strike back legally and lawfully."				
	46:25 back from break and redirects to lawsuit. Talking about firm that filed the suit as ambulance chasers.				
	Got cut and pasted-- they are identical.				
	47:30- document cam shot to the lawsuit. The last suit had Kit Daniels as a Defendant but this one they took out Daniels and replaced with Shroyer.				
	53:45- take callers. Counteroffensive that left wing has launched.				
	55:50- financially a big challenge to Infowars. Gotten 8 lawsuits thrown out but 9 more going.				
	There isn't a retraction to make because you didn't say these things but...				
	Temper tantrums.				
	1:11:55 pivots to other topics.				
	Kind of seems like he relates everything back to SH lawsuits.				
	Keps going back to database and Judge that married Soros.				
	1:28:34-back from break. Witchhunt from Russia. Judge again.				"Wood was Famously Dubbed the Love Judge After Romantic Scandal"-- Dana Manister
	1:29:35- back to lawsuit again				
	Going through lawsuit. Fake news will just spew it out.				



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	1:32:21 caller David from PA re: trump. Wants martial law.				
	Caller- wants to confront Comey at Barnes & noble at hs book tour.				
	1:46:09- It's been 4 years and I've looked it up I played devil's advocate.				
	Beau Bridges and Bo Hicks. Doesn't mean interview didn't happen. CNN saves \$ by not going there.				
	He goes in and out talking about SH and Parkland. There was a stand down.				NY Times: ISIS uses chemical arms at least 52 times in Syria, Iraq
	I can't look at these parents and say they didn't lose a child.				Syria fake video
					Clip- progressivechangei nstitute re: maternal mortality.
	Re: trump/Stormy Daniels.				Hannity clip of him being a client of Michael Cohen
	2:07:36 About incereased migration of Africans to Europe.	Paul Watson			Colbert clip re: Cohen.
Media Matters	Talking about Obama's push for gun control, crying over dead children in SH but does bomb strikes killing children in Syria.				
Para 37 of Pozner Comlaint	"I didn't kill your kids."-- ACKNOWLEDGING THE CHIDLREN ARE DEAD				

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	"Open and shut it's a government operation at the movie theatre"-- talking about Aurora CO shooting at opening of batman.				
	Shooter all drugged up and is a patsy.				
	SH's got inside job written all over it. "The Parents always working for DARPA."				
Megyn Kelly Interview with AJ	1.3 billion views on Youtube.				
6/18/2017	Suicide Bomber in Manchester England.				
	"Liberal trendies"				
	Media misrepresenting and clipping the comments. Ages of victims weren't even known.				
	Clip with Donald trump appearing on Infowars.				
	"Access to the seat of power" Temporary press pass to WH to first time.				
	Discussions about the 2016 election.				
	It costs 45-50m/yr to run everything. Anything made put back into business.				
	8:15 mark clips of interview with Heslin.				
	8:50- "AJ repeatedly claimed the shooting never happened."				
	Clip of AJ 12/2014- "It took me about a year to come to grips with the whole thing was fake. I did deep research and my gosh it didn't happen."				
	We know there's mass shooting and these things happen, there was some manipulation. Played devil's advocate.				
	9:50- the coroner did autopsies of the bodies. "They blocked allt hat and won't release it that's unprecedented."				



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	10:12- "The entire thing was fake" that is him playing devil's advocate.				
	Looks like a drill-				
	"Parent's faked their children's death."				
	Never completely disavowed his previous statements.				
	12:41- Pizzagate				
	Chobani lawsuit re: AJ allegation that employee committed a sexual assault in Idaho.				
	"That was a publicity stunt." Year long sexual assault investigation				
	Had to issue a retraction that we were covering other people's reports.				
	Infowars was only media outlet that reported on the lie that forced a retraction.				
	No script- piles of articles off the internet. Discussing an article.				
	15:50- what is the vetting process?				
	16:04- infowars staffers have free reign to cover whatever they want with virtually no oversight				Clip of Owen Shroyer Interview
	Shroyer- look at the news, rarely get directives from Alex.				
	Don't like calling myself a journalist. "The Deplorables."				
yix	How the school board refuses to answer questions, just filing FOIA requests.	Alex Jones	Wolfgang Halbig		Sandyhookjustice.com
5/13/2014	Teach them how to respond to FOIA requests.				Video of first FOIA hearing
	References video of FOIA hearing, and Halbig to send video of him going to United Way and being blocked.				

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Who is the surveillance contractor that installed the security system? There should be emails regarding history of the surveillance.				
	As a school safety expert, leading national expert				
	Red Flag- United Way. Follow the money. Amount of money poured into Newtown, it all starts at United Way.				
	Advertised three days before shooting.				
	Bloomberg false started the day before, claim that there was going to be a mass casualty event and to be ready to take advantage.				See Heslin 19-000074 Infowars article Aaron Dykes "How Bloomberg Planned to Seize upon gun tragedy" 3/12/13
	Letters written to United Way and SH Promise Fund (pass through). A lot of money. Motive				Observer Politics Article on Bloomberg's premeditated exploitation campaign.
	Trauma helicopters not ordered.				
	AJ- bottom line there was a stand down. Asked Halbig about kids going back and forth? Guy in the woods?				
	Coverup is the prima facie proof of the larger crime and that we're being lied to."				Newtown Bee Article: Man in woods was an off duty tactical squad police officer from another town.



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Being a customs officer and a Police officer, iknow bull when you see it.				
	9:49- Anderson Cooper on green screens saying he's out there then jumping the gun (referenced alleged Bloomberg article "false start.")				
	Admire Dan Biondi because he went there during boston bombing which was a drill and the older brother is a CIA operative 2 years before then after bombing Russians had blown spies covers and giving a list of names, work with extremist groups. Did he get turned?				
	Filthy school- groundwater is contaminated.				
	"Clearly it's a drill just like the boston bomnbing. I don't know exactly what's going on but the official story isn't true." "Just from a lay investigative journalist perspective something is rotten here."				
	14:48- Halbig says "until they answer these 16 questions, I can tell you children did not die."				
	There isn't a navy seal within 8 minutes that has a 99% kill rate. Adam Lanza couldn't have done that.				
	Steve Sedensky's report 7000 pages.				Newtimes.com: "Final SH report still leaves questions" 1/1/14
	United Wway is an anti-gun organization.				video clip of Halbig at United Way
xp9	Time it took to get into the building and analyzing police response. Examining inconsistencies.				

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
11/23/2013	Looking through footage from cruisers				Dave Altamarri, Hartford Courant article 11/22/13 "
"Final Statement on SH"		Alex Jones			Video clip of witness re: second shooter
mwud					CBS news clip of John Miller re: second shooter.
	AJ on "Obama fake crying."				Clip of Obama giving press conference after SH
					Clip of Robbie Parker
					Clip of Lt Vance re: misinformation
					Clip of Halbig at FoIA hearing
	"I don't know if they staged this one, but the same familiar tell tale signs are now coming out."				
	"Corporate media wants to misrepresent what I said."				
	Shows traffic for <a href="http://newtown.k12.ct.us/~sh--">http://newtown.k12.ct.us/~sh--</a> no traffic from 2008-2013.				Waybackmachine
	Word is that school system was shut down for those years.				
	"I don't put anything past those anti gunners."				
	Kids going in circles around the building				
	Emergency helicopters weren't called but portapotties.				
	Man in the woods-				



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	9:50 Anderson cooper nose disappears.				Clip of anderson Cooper interview with Veronique De La Rosa
	Got everything after Columbine and that was in the 90s.				NiemanLab, Kristen Bergman, "Privacy vs. Transparency: CT bans access to many homicide records post-Newtown" 6/11/13
					Inofwars article re: Halbig getting threatened 2/18/14
					Infowars article re: Lanza home being demolished 3/25/15
	Lawsuit against Buschmaster even though Lanza did not purchase gun.				
	School demolished.				"Non-disclosure required for SH school crew" Nanci Hutson 10/14/13
	Rob Dew's uncle, respected FBI agent who runs his own security firm is at the FOIA hearing				Infowars: Retired FBI agent investigates SH" 7/7/15

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	"All these beauracracies have paper trails." Uncle said he never sat in a court proceeding like that. Small town, biggest event in their history and there is no paperwork and no one knows anythign.				Clip to Rob Dew
	When MSM attacks you, it's because it's your strongest information and they want to discourage you. Want to discredit you.		Keith Johnson (American Free press) vs. Halbig		
	Hosted a debate showing both sides.				
	15:09- out of context, said IDK what happened, but it should be looked into. Why should we be afraid to look into it if nothing to hide? Shakespeare's hamlet.				
	If children were lost at SH, my heart goes out to each and everyone.				
	"Only problem is I've watched a lot of soap opers and movies and I know when I'm watching something real. Let's look into SH."				
tm5	*This documentary had received millions of views on Youtube*	Rob Dew			
"Why People Think SH is a hoax"	MSM calls anyone who questions as conspiracy theorist.				
	SH has some of the tell tale signs of being an inside job, same signs you will see if gov't is just using a good crisis.				Clip of Rahm Emmanuel "don't let a serious crisis go to waste."
	Evidence is beginning to come out that points more in that direction				



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	People behaving like actors.				FAIR: "Why were gov't propaganda experts working on news at CNN?"
	2:35 blue screen situation with CNN. This is why we question these things.				CNN footage re: them faking being in Saudi Arabia but weren't.
	US gov't used terrorists to stage terrorist attacks.				WAPO Jeff Stein Article "CIA unit's wacky idea: depict sadaam as gay."
					"Terrorists helped by CIA to stop rise of left in Italy" - The guardian Phil Willan 3/25/01.
	Goes into false flag of OKC bombing.				OKC bombing first responder 12/22/11.
	8:04- I clearly believe from the evidence children were really killed				
	re: second shooter.				
	Robbie Parker clip.				
	Comparison of US crime rates 1992 vs. 2011				Larry Pratt on the batman Shooting 7/26/12
	TX shooting				
	13:15 Anderson Cooper video footage- COOPER has some explaining to do, not Veronique de la rosa. Don't trust CNN anymore.				archive.org
u8r	Children of Sh to play at superbowl				

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
2/2/2013	conditioning of the public to give up their gun rights, TSA will be patting down.				USA today "Newtown students to sign at superbowl" 1 month after shooting
	After game, will be talking about Beyonce if she was lipsyncing.				
	Does not show that fake sueprimposed picture.				
5efy	Dr. Steve Pieczenik: Sandy Hook was A Total False Flag!	Alex Jones	Dr. Steve Pieczenik		Steve Pieczenik's website.
	3:46- first topic is Bin Laden. About maintaining the narrative.				
	17:08 break, ads.				
	22:58 another break				
	27:15- SH is finally mentioned in the context of politics surrounding gun restrictions.				
	"Sh was a total false flag." There weren't 24 kids who were killed.				
	False flags repeatedly with this president.				
Shqsv	Not feeling depressed.	Alex Jones	Dr. Steve Pieczenik		
4/1/2013	Aurora, CO gag order.				
	Psychiatric diagnosis				
	GAG ORDER Obama broke on SH no one died but if they had, federal offense of a gag order.				
	Sentenced top consecutive life sentences and it is meaningless.				
	Defense attorney broke a gag order, indcitment of the false flag of SH.				



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	AJ- a lot of evidence of false flags at SH. Want to give him truth serum to plead guilty, I see false flags all over the place, not just SH.				
	President put a line in the sand and these poor kids who were never killed, never present. Beginning of end of false flags (AJ doesn't say this)				
	8:16 AJ- get they do false flags, how do you figure no kids were killed? Might as well kill some kids.				
	9:45 back from break				
	What is your take? Bloomberg was ready the month before and people look like actors?-- AJ				
	Susan Collins out of script from one of her books.				
	Whole group of actors, IS42- social media management.				crisisactors- ad for actors for simulation training.
	Kids in various acting schools before.				
	Worked in Greenwich CT so know SH very well (Greenwich is like a full hour away).				
	White wealthy community filled with guns and alochol but no evidence of killing, violation of gag order and everyone violated the gag order.				
	12:20- Why do they want our guns so bad? AJ				
	Sociopath to destroy the system. Not competent to serve. Degradation of people going into politics. Obama is self-destructive				
	Impeachment, but then biden is on deck.				
	Not worrked about China or banking system. THEY LITERALLY CUT HIM OFF MID-SENTENCE				

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Back from break and he hasn't even stopped talking.				
	Trying to start a civil war coming after our guns?				
	38:30 cut him off mid sentence again.				
	39:20 back from break. AJ- what is America's underlying core that made us so successful.				
	39:40 cameback from break and took a caller who disagrees with Pieczek.		Caller: Dr. D.		Infowars article: Dodgeball now banned in public schools as nanny state goes insane.
	No-bama character.				
	Re: Dr. Pieczek's concerns about China.				
	40:45 Pieczek interrupts caller on issue of water.				
eslva	List his credits	Alex Jones	Halbig		
3/14/2014	"I've looked at it, coverup there's actors and caught liars. Preplanning."				Adan Salazar article: "School shooting expert threatened over SH investigation" 2/18/14
	"regardless they're not letting a good crisis go to waste."				
	FBI new haven office classify the SH shooting. FBI has never classified a school shooting.				
	Called the NH field office, told it's classified. Demand a copy of report with leaders.				
	"Using children and teachers as a ploy to scare people."				
	Trauma helicopters.				
	AJ- "video of kids going in circles. Unmistaken drill."				



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Don't let paramedics inside school.				
	AJ "So they overrode the default settings? YOU'RE saying Standard OP ignored?"				
	Declared legally dead in 8 mins.				
	Where did the 500 children go that day?				
	Biohazard company to decontaminate school				
	AJ- "Continuing with the 16 points."				
	Lieutenant working a construction detail less than 2 miles away but stayed at his off duty job for 4 hours. Another female officer left the duty site to go to the shooting but he didn't?				
	"They want me to stop asking these questions. Why?"				
	"SH elementary school had highest level of lead paint and asbestos and PCP."				
	AJ- "bulldozed school now."				
	AJ- "Green screen with Anderson cooper and staged interviews and actors playing parts of multiple people."				
	What is your take? We know they've staged other stuff.				
	Halbig- using supposedly live feed,				
	AJ- about Anderson cooper and cut to wider shot can see garbage blowing and then blows back like its on a loop."				Cut of video of Anderson Cooper interview
	Halbig- where did this script come from?				
	14:30- AJ says that Bloomberg had his networks ready 2 days before.				Source?
	14:55 AJ says Anderson Cooper was in the CIA, runs the hoaxes at CNN.				Cut to footage of CNN pretending they were in Syria on a green screen.

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	"I pray to god that I'm wrong."				
	People need to go to jail.				
	AJ- Boston bombing was staged as well, was a drill. They're running hoaxes.				
	Break, AJ "we want to send reporters up there with you."				<a href="http://www.shjustice.com">www.shjustice.com</a>
rSL	1st FOIA hearing	Dan Bidondi	Halbig		Adan Salazar article: "School shooting expert threatened over SH investigation" 2/18/14
	Inspired by threats.				Video from hearing
	Biggest red flag in your head?				
	Submit to gun control don't ask questions.				
	Imagine a country where you can't ask questions				
x2A	After Halbig came back from FOIA hearing.	Alex Jones	Halbig		"Newtown School board shuts down conspiracy theorists" 5/11/2014
5/13/2014	Refuse to respond to FOIA request				
	Teach them how to respond to FOIA requests.				
	Halbig- "Think they're not answering questions because will expose their scam."				
	When you don't respond, it raises the red flag.				
	United Way				
	AJ- Bloomberg false started the day before as well.				Source?
	"They're all working together it's a coverup no doubt."				



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Globalists- of course they would stage something like this to get our guns.				
6ak	Not conspiracy parents were involved in.	Dew	Halbig and Keith Johnson Debate		
	hoax against the truth movement. Spun into a conspiracy theory.				
	Called into Question Tracy and Fetzer with deliberate disinformation.				
	Did investigation on Independent Media Solidarity. Same old speculation and debunked theories.				
	Dew- this stuff leads to gun restrictions.				
	Halbig-"What are YOUR conclusions."				
	Halbig quoted Keith Johnson's article entitled "Wolfgang Halbig is a Fraud." Calls him a school resource officer and called him a "school resource officer."				
	Cited redacted final report.				
	Where are autopsy reports?				
	Dew- people don't trust the government. When you type in SH conspiracy, there are millions of videos out there.				
	"You're always going to get the crazies out there like anything."				
	Dew- Enough to demand answers.				
	Keith Johnson "Mr. Halbig you are a fraud." Was a highway patrolman. Has previously said he was a homicide investigator.				
	Columbine reports- his name is not on any consult list.				

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	So many people believe you're an expert. National Incident management systems of a 3 hour online course.				
	"You're the source."				
	Have not seen anyone with any credible law enforcement experience. There is never any law enforcement or medical experts.				Newtownpostexaminer.com
	Theory re: hole in broken glass. Read excerpts re: real experts.				
	People he's actually interviewed.				
	"Why are you so interested in keeping up with me, don't you have a job a life?"- Halbig				
	Final Sedensky Report report says Lanza's body found in classroom 10 but Lt Vance said found in the hallway.				
	Now Halbig wants to focus on "lie" of where the body was found.				
	18:38 Dew moves on to another topic of the squad car video.				
	Portapotties-- they didn't come until the 11:00 hour, big reason why they would need to have food. So they have food? What does that prove to me? It's not even an issue. People have to eat.				
	Dew- That's fair, but they seem nonchalant.				
	Dew- Firestation walking in circles?				
	This is a looped video.				
	Sign in sign-- that sign wasn't brought in until the following Monday. No evidence that sign was there the same day.				
	Provided ID cards for the days afterward.				
	Halbig- goes back to food.				
	School was operating?				



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Keith- helicopters. Last mass casualty incident at Brewery, there are helicopters were standing by because they figured they could transport the victims easier by ambulance. Only 1 or 2 victims via helicopters.				
	identifies Halbig as the SOLE source of these theories.				
	11,000 page script that Fetzner claims Halbig is in possession of, in a Youtube video Halbig says that it wasn't an 11,000 page script.				
	Who were the first 3 people inside the school? Start doing a quiz.				
	Dew- If the school has been in operation, there would be work orders. Why not just give him the work orders?				
	He has not posted a formal request.				
	Dew- move on. What does Halbig have to gain?				
	Regurgitate something someone else said.				
	36:00- female school principal would never have allowed her school to look so filthy.				
	Toxic waste dump. The doors are rotten, mold, mildew. "Deplorable."				
	Dew- re: security system. Push a buzzer, person looks on monitor and buzzes in. Not a recording feature. Report says that clearly. Installed in 2006.				
	System installed in 2006 (6 years previously). Halbig acknowledges this.				
	New security system after that sent by letter to parents.				



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	References article that came out in the Courant-Principal outlined new procedures. "Will be implementing a security system." They outline the system. There was no date on this.				
	Halbig redirects to "filthy school."				
	What does it prove even if it was dirty?				
	Wayback machine has been debunked.				
	Dew- 46:00 "I'm still not convinced one way or the other."				
	We're talking about parents, small town. Can't attack these people without solid proof.				
	Dew- I agree with that statement."				
	Halbig- 51:20 "I'm not questioning any parents. I simply want to know."				
	Dew- I don't think either one of you are frauds. Love the debate.				
7ib	Many topics--	Alex Jones	Guest: Halbig		"Nations all over the world admit to false flag terrorism." Infowars
3/4/2015					Sandyhookjustice.com
	People trying to shut down our Youtube page.				
	Asked Halbig- outline why it doesn't add up and now they're trying to shut us up just tell us why.....				

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	"1. Why Nose disappears; 2. people walking in circles; 3. Why did they say they didn't catch anyone in the woods when they did; 4. why was the school closed before then after; 5 why Bloomberg sent an email the day before; 5. why didn't they launch emergency helicopters; 6. Tell us why ambulance is parked for an hour and half..."				
	"Tell us why this appears to be phonier than a \$3 bill."				
	AJ- "Copyright claims defeated."				
	AJ- "They'll probably take you out." "That's how they do it now, they kill you and your family."				
	Have documents now that the school never existed.				
	Break				Infowars article: "Six year old child suspended for making gun shape with hand."
	"Bombshell Info" breaking today: school suddenly reopened then tore it down, school is filthy."		Halbig		
	AJ "It didn't look like a real school, then you add everything together and it looks like a prop, a drill"				
	"Did they kill real kids? Maybe, maybe not" "Just doesn't add up."				
	Bombshell-- subpoenas have been issued.				
	Thinks it will show that school was not in operation.				
	Turned off default training.				



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Used to do active shooter training, which is to get into school as quickly as possible.				
	AJ "Why was every standard procedure ignored? Why do they want to shut us up?"				
	Break 14:49				
	"I know 120 incidents staged and blamed on political enemies."				
	Boston bomber.				
	"False flags are the bread and butter within totalitarian governments."				
	No Diatribes against one side or the other, just serious questions from callers.				
	Fake green screen, loops.				
	"All the signs, they were so ready that day how they rolled out the groups."				
	Aurora CO shooter				Infowars Article- "Shooter James Holmes and DARPA weird science" 7/24/12
	"I'm not saying that happened at Sandy Hook. I'm saying it was a drill. A giant piece of theatre. Did they really kill some kids? I don't know, but the school appears to never have been open."				
	ads				
	Back to Halbig- Know it wasn't operating because the board says there are no safety inspection records and the records are mandated to be produced.				
	24:00- not calling emergency helicopters, that is the default position.				
	No Helicopters but called portapotties.				

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	24:56- AJ "Same actors to break down and cry. So stupid use the same actors"				See FSSTX-015322
	AJ- "Maybe they're real parents or whatever, but when you someone who is laughing and smiling				
	Bloomberg internal email- "Get ready we're about to launch a major operation."				
	Halbig- This is so well planned, 2 years, millions of dollars.				
	Alelgation eating lunch inside the school.				
	29:00 AJ- I looked you up when you started going public last year, top 2-3 groups consulting.				
	Lawsuit filed in FL because that's where I live				
	AJ-"It's phony, the question is what's going on? We just know it's fake. How fake? We don'tk now.				
	Break				
	Halbig- Need an environmental study before demolishing a building.				
	Caller- re: bus driver who picked up students and took them to his house.				
	Halbig's claim re: hole shot through the window.				
	Caller- Robbie Parker works for the CHIP program, register your kids into a database to find your kids.				
	Caller re: bushmaster lawsuits being proof that this was all about gun control.				
	42:38- WE have debates on here about SH.				
	Man in woods at 12:23pm.				Cut to clip of news footage at 12:23pm
	Rifle did it but news rifle found in car?				
5cII	FOIA hearing.	David Knight	Guest: Halbig		



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	What did you learn at this hearing?				
	Told witnesses not to show up.				
	Missing time stamp. Are they edited?				
	Perjury by Mike Kehoe police chief.				
	"Unwanted person call" initially.				
	Everyone must sign in sign.				
	Janitor-				
	mold-				
	"Fired my first attorney because I think he's in collusion with the other attorney." Hired another attorney.				
	12:07- went to governor's office and filmed.				
	Pitch to get money for legal expenses.				
	14:48: we want to know where those kids are that sang at the superbowl, we can't find them anywhere.				
	We often get these contradictions out of the government because they are covering something up.				
	Anyone who does an investigation is dismissed as a conspiracy theorist.				
	Halbig- Need an environmental study before demolishing a building.				
	He has investigated other school shootings and has never seen anything like this before.				
so8	Immediately after SH gun control.	David KNight	Dan Bidondi		Cut to article by Adan Salazar 2/14/14 re: Halbig being "threatened" over SH investigation



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	"Wolfgang was a principal of a school and a police officer, so combined those."				video feed of meeting 5/16/14
	"I'm a national school safety consultant and I travel the country." Never had this kind of resistance, intimidation.				3:53- cut back to video from the meeting.
	Dan Bidondi- interview with Halbig at FOIA hearing.				
	What are the biggest red flags? Helicopter has no audio.				
	Flight log- says assist in locating shooter in woods.				
	"I was at Columbine, 14 children who died, all the parents filed a lawsuit."				
	Don't give a damn about the town- wants stuff from the police department and the school, but the town represents those entities.				
	Copies of videos but the videos they reviewed had time stamps.				
	4:48- they sent police to my house not once, but twice.				
	"Bullying tactics, typical police tactics, expect us to keep our mouths shut and not ask questions."				Video montage of MSM.
jco		Alex Jones			
7/7/2015	"These things don't add up and when ppl investigated they were threatened."	Rob Dew			
	Official story doesn't add up-- goes through Halbig's 16 questions.				
	Bloomberg the day before prepare to roll.				
	"I began to investigate"				

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Few's uncle, retired FBI Navy seal.				Infowars: Official claims DHS involved in SH 6/5/15
	Uncle "investigates SH."				
	4:14: I don't want to believe it's a false flag, I don't know if kids really got killed."				
	"I don't know what happened. I don't know how they do it but it's not real. It's staged."				
	Dew- Called and spoke to his uncle. What made you want to go up there? A friend of mine said I should go up and check it out.				"Who is Wolfgang Halbig" -- his CV
	Lawyer has an interest in keeping SH alive. He told people not to show up who were subpoenaed.				
	"It's little things..." Uncle said, "I never sat like a proceeding like this. Biggest event in their history and no one knows anything and there's no paper trail."				
	he used to go after the mob. Stuff is being delivered and no one knows how it got there. He thought that the check in sign was important that DHS was there.				
	At first uncle said he believed the official story. They should just be giving the paperwork and moving on. No one acts like that if nothing's going on.				
	Videos without timestamps. AJ "Mega Massive coverup."				
	Based on all of his experience as FBI agent,				



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	13:00 on green screens and everything. Manhattan project of gun grabbers.				
	No permission slips for SH kids to go to the superbowl. This is one of Halbig's questions. Didn't make an deal of the kids going to the superbowl.				Adan Salazar- "SH victim dies (again) in Pakistan." 1/2/15
	"We are onto something big here."				Clip of Bidondi's interview with John Dew.
	Closing arguments in FOIA hearing tomorrow.				
kf2		Alex Jones			
"Media Refusees to Report AJ's Real Statements on SH"	#1 story Megan Kelly/Alex Jones-- response to Kelly interview.				
	MSM won't report his actual comments. Kelly interview should be shelved. Misrepresented my views on SH.				
	put out 2 years ago probably happened.				
	Devil's advocate statement arguing both sides out of context.				
	Put out 2 days ago a video saying it happened.				
	Megan Kelly is in with the SH groups.				
	Interivew is going to be edited to misrepresent. In promo she is making it seem like I said it didn't happen.				
	Saudi Arabia declassified docs- family came out and said ISIS bombed them				

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Questions MSM in real time.				NY Times: Syrian Boy who became image of civil war reappears 6/7/17
	Intimidation if you question official narrative.				
	Kelly told me I'm not getting into SH.				
	Public is distrusting and there were anomalies.				
	gov'ts are famous for staging or using an incident to its advantage.				Infowars: Watson- "MSNBC pretends obama campaign director random woman on the street." 6/13/17
					More examples of actors below it. (ex: interviewing their own camera people)
	Actual quotes in there from his past videos.				ZeroHedge: "AJ implores NBC not to air interview with 'liar' Megan Kelly" 6/15/17, ibankcoin.com originally
	ISIS rebels using nerve gas and blaming it on the russians. Staged events over and over.				Aleppy Boy versus



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Dinosaur media panicking.				Megan Kelly dropped as host for SH group's gala over Alex Jones interview- Travis Andrews 6/13/17
	not what I said-- I said I believed people died.				Independent- "AJ doubles down on SH conspiracy theory in 'disgusting' Megan kellyn interview."
	British Ambassador chemical attack carried out by rebels, but really was ISIS, incubators, CNN caught doing fake town halls.				
	Zero Hedge article republishes his questions about SH, many of which are regurgitations of Halbig's 16 questions-- these are questions that the public has.				
	Anderson has been caught in the past faking his location via blue screen.				
	"I believe kids have died."				
	Owen Shroyer next in studio.				
syf	Civil war against globalism.	Alex Jones			



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Dems throwing temper tantrum over russia investigation				CNBC article "Dem party files suit alleging Russia and trump campaign conspired to disrupt 2016 election"
	4:00- Megan Kelly Interview because all over the news.				CNN "Is trump right? Could a 400lb couch potato have hacked the DNC?"
	"Anomalies"- done with tar baby about 1 year into it. Gov't standdowns.				4/17/18- "AJ responds to SH lawsuit."
	"I'm a real journalist"				Youtube- AJ Megan kelly full interview leaked 6/15/17
	On audio telling him I'm not going to talk about SH but then gets on her show the next day with some of the parents and says "isn't it horrible he keeps bringing it up."				CNN: SH families sue AJ for defamation.
	10:31- back to Kelly interview.				CNN associates infowars with Pedo channel in bid to shut down its competition
	Stop bullying us why won't he go away?				tweet-4/19/18

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	I'm not bringing it up. Responding to media and when they're in the media.				Newstimes: SH father calls out AJ on Megan Kelly Show
v2L	They have 4 sec clips Hillary edited for ads.	Alex Jones			
	33,000 articles on Megan Kelly interview				
	1:50 Email from Lenny Pozner in 2013- giving him condolences and asking him on the show.				
	Devil's advocate discussion.				
	2:55- pizzagate.				
	6:00 re: Veronique de la Rosa re: lawsuit. Wants accountability. "Relentless period of years to peddle falsehoods and profit from them."				CNN interview:
	Part of lawsuit includes an interview that Cooper and she did together.				
	"desecrate my son's memory"				
	"We both know the pain that came from that night."				
	I'm not saying this lady is lying, All I'm saying maybe they were in a studio.				
mi3	Why globalists want disorder	David Knight			
5/29/2015	Discussion on article of rights of chimpanzees.				
	Peter Singer				
	Rise of robots.				
	DARPA				
	Outbreak				
	Interview re: second FOIA hearing and third hearing coming up.		Wolfgang Halbig		
	28:53 "Investigated many school shootings."				
	"school safety consultant."				
	Cut to interview with Halbig at FOIA hearing.	Dan Bidondi			



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Interview starts at 40:26				
	Told people subpoenaed not to show				
	No time stamps on video provided.				
	Police chief committed perjury.				
	Next date 6/30/15				
	"we're going to file perjury charges." First 911 call is a woman says shots fired in school.				
	However, the logs were dispatched as an "unwanted person" call.				
	Re: check in log.				
	Whole purpose of government is to keep us safe. If they're not going to tell us what happened they have a different agenda-- knight.				
	CT state trooper 1 flight log, but claim there is no communication with the helicopter. Reason in logs were to help in search for suspect in the woods.				cut to aerial video of people running in woods.
	Janitor- person who is supposed to initiate work orders. Work orders completed in Summer 2013. Why would you work on a school that is going to be demolished?				
	Conditions of the school.				
	Governor Malloy's lie- he started out by saying Lt. Governor and I were spoken to about something like this might happen in our state. Malloy denied saying this.				
	Knight- how can people support you?				
	6/3/15 hearing- subpoenaed the pilot of the helicopter, the janitor, and the new principal from SH elementary school re: the kids who were at the superbowl in 2013.				

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	55:15 Knight says that one of the parents whose children died put a false claim on youtube re: a copyright issue with Fox.				
	At the end, Knight vouches for his history-- "Halbig has investigated other school shootings, was involved in Columbine, and never saw this type of stonewalling. What is underneath this?"				
rUn	Investigations into Wikileaks.	Alex Jones			
4/22/2017	New SH information.				
	500,000 Iraqi Kids dying was a "reasonable price to pay"- Madeline Albright. Tie that into SH.				CBS news
	Sadaam was a CIA operative, US ambassador told him it was OK.				
	Lied to about WMDs in 2003.				
	We don't choose sides except for the truth and it's not easy to find.				
	Media has said I said attacks never happened. 7 debates with both sides.				Infowars "Explosive debate over SH" 12/13/14
	I believe mass shootings happen. But 5000+ articles say Moon landings never happened, loch ness monster real.				Cut to web search of articles.
					Breitbart: "Sweden: Ban Cars to stop terror"
					Edmund Kozak "Media meltdown over Trump correctly calling Paris attack terror"



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	Article claims that Jones said no one was hurt at SH, they were actors.				New Yorker Magazine "Donald Trump and the Amazing Alex Jones" 6/23/16
	Cobra Commander-- part he played during election.				The Hill: "AJ "Playing a character"
	Making fun of people who are paranoid as satire. He's backed off of satire over last couple of years.				Cut to clip of Alex wearing a joker face.
	25:25- New SH info. I've said I believe people died, played devil's advocate.				infowars: Megyn Kelly caught editing tape to demonize Alex Jones.
	Talking about Anderson Cooper nose disappearing and how CNN has been caught in the past not being at the site but claiming they were.				The Guardian "Migrant Slave booming in Libya"
	Pizzagate				International Business Times: "Migrants from West Africa being sold in Libyan markets for \$200" 4/12/17
	We've never seen the traffic to the site as did during the election. Record support.				New Republic: "Earth day too white and out of touch with reality."



	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	35:54; back to SH. Why is one of the headlines about our "vampires exposed?" Vampires are the corporate media. Don't let a good crisis go to waste, bloomberg, email. Should be investigated. Kill the shooter as a patsy. We've entertained the idea because a lot of people online were.				WND: "Salon deletes articles defending pedophilia from site." 2/21/17
	38:00 "Why do I call these people vampires"? They lie over and over. Goes into discussion of politics they are lying about.				Hand drawing information vs. knowledge (43:26)
	35 is the peak in physical and mental prowess. Discussion of how historically we were adults by 16 but now we're waiting till 35-40 to start our lives.				
	Fights, sex, rituals rights of passage.				
	Am I bad for questioning a government doing all this evil?				
	Did I say no kids died? They took a clip out of context in a debate.				
	False flag video montage.				First part are clips are babies in incubators. Second part about Vietnam
	58:08:00				CNN gets caught not in Syria using green screen.
	59:00- SH is a quagmire. So secretive and so that's why people questioning. Wrong name of shooter, finding people in back woods.	Rob Dew			Hillary, chemical weapon attack in Syria by Assad.

	DESCRIPTION	REPORTER	INTERVIEWED	LOCATION	SOURCES
	AJ repeats many of Halbig's 16 queestions. Dew adds dash cam footage of cops eating.				Daily Mail Online: "Bizarre moment CNN anchors try to pretend they're not in the same parking lot."
	Dew- never any blurred photos of bodies. We saw nerve gas kids in Syria.				
	Dew- n teleprompters. We have subjects we may concentrate on but get on there and find the news. Libertarian/conservative.				
	Placeboing is site that splices his videos and makes parodies.				Youtube placeboing of Alex "Trendy"
	That was him engaged in satire and they don't get it.				
"America the False Democracy: 12/24/2014	Race issues following death of Michael Brown, Ferguson MO protests, MANY topics	Alex Jones			
	Callers. One specific caller about SH on p. 46. "The whole thing's a total hoax."				
	p. 47 AJ repeats claim school was closed the year before				
	Kids going in circles				
	Green screen re: Anderson cooper.				
	"Took me about a year to come to grips with the fact the whole thing was fake."				
	"It just pretty much didn't happen."				
	Caller- false flags coming in 2015.				



1/27/2013	4/9/2013	4/16/2013	3/14/2014	5/13/2014
Chris Alaniz	Nico Acosta	Nico Acosta	Nico Acosta	Nico Acosta
Kristi Hightower	Chris Alaniz	Chris Alaniz	Jon Bowne	Jon Bowne
	Sarah Czak	Jon Bowne	Sarah Czak	Sarah Czak
	Derek Einkauf	Derek Einkauf	Kit Daniels	Kit Daniels
	Lee Ann Fleissner	Lee Ann Fleissner	Lee Ann Fleissner	Lee Ann Fleissner
	Jakari Jackson	Jakari Jackson	Jakari Jackson	Jakari Jackson
	Rob Jacobson	Will Jones	Joseph Jennings	Joseph Jennings
	Christopher Jordan	Christopher Jordan	Christopher Jordan	Christopher Jordan
	Molly Maroney	David Knight	David Knight	Travis Knight
	Darrin McBreen	Molly Maroney	Darrin McBreen	Darrin McBreen
	Kurt Nimmo	Darrin McBreen	Marcos Morales	Marcos Morales
	Robert Reeger	Marcos Morales	Kurt Nimmo	Kurt Nimmo
	Molly Rogers	Kurt Nimmo	Josh Owens	CJ Oden
	Adan Salazar	Robert Reeger	Robert Reeger	Robert Reeger
	Louis Serrtuche	Molly Rogers	Molly Rogers	Molly Rogers
	Heath Speakman	Adan Salazar	Adan Salazar	Adan Salazar
	Carter Watkins	Louis Serrtuche	Louis Serrtuche	Louis Serrtuche
		Carter Watkins	Heath Speakman	Heath Speakman
			Carter Watkins	Carter Watkins



9/25/2014	12/27/2014	12/29/2014	1/13/2015	2/12/2015
Nico Acosta	Louis Serrtuche	Nico Acosta	Nico Acosta	Nico Acosta
Joseph Biggs		Joseph Biggs	Joseph Biggs	Joseph Biggs
Jon Bowne		Lee Ann Fleissner	Jon Bowne	Jon Bowne
Kit Daniels		Richard Gaines	Kit Daniels	Kit Daniels
Lee Ann Fleissner		Jakari Jackson	Lee Ann Fleissner	Lee Ann Fleissner
Richard Gaines		Joseph Jennings	Richard Gaines	Richard Gaines
Jakari Jackson		David Knight	Jakari Jackson	Jakari Jackson
Joseph Jennings		Travis Knight	Joseph Jennings	Joseph Jennings
David Knight		Darrin McBreen	David Knight	David Knight
Travis Knight		Marcos Morales	Travis Knight	Travis Knight
Darrin McBreen		CJ Oden	Darrin McBreen	Darrin McBreen
Marcos Morales		Adan Salazar	Marcos Morales	Marcos Morales
CJ Oden		Louis Serrtuche	CJ Oden	CJ Oden
Robert Reeger		Ryan Sheridan	Josh Owens	Josh Owens
Adan Salazar		Mikael Thalen	Robert Reeger	Robert Reeger
Louis Serrtuche			Ryan Sheridan	Adan Salazar
Mikael Thalen			Mikael Thalen	Louis Serrtuche
				Mikael Thalen

**From:** [Jacquelyn Blott](#)  
**To:** [Mark Bankston](#)  
**Subject:** RE: Depositions  
**Date:** Wednesday, February 9, 2022 11:29:09 AM

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Mr. Bankston:

The corporate representative is Brittany Paz.

Again, you are making assumptions. FSS is designating her as the corporate representative now as FSS has ultimately decided that she meets the requirements as enunciated by Judge Guerra Gamble in her ruling from the bench with respect to what is required of the corporate representative.

Best regards,

Jacquelyn W. Blott

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**From:** Mark Bankston <mark@fbtrial.com>  
**Sent:** Wednesday, February 09, 2022 11:04 AM  
**To:** Jacquelyn Blott <jblott@jblottlaw.com>  
**Cc:** Bill Ogden <bill@fbtrial.com>  
**Subject:** Depositions

Ms. Blott,

You never provided the identity of your corporate representative for the depositions next week. Can you explain why you chose not to?

Mark Bankston  
Kaster Lynch Farrar & Ball, LLP



### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Carmen Scott on behalf of Mark Bankston  
Bar No. 24071066  
carmen@fbtrial.com  
Envelope ID: 62311009  
Status as of 3/8/2022 10:23 AM CST

Associated Case Party: NEIL HESLIN

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Avishay Moshenberg		avi.moshenberg@mhllp.com	3/4/2022 1:11:35 PM	SENT
Mark D.Bankston		mark@fbtrial.com	3/4/2022 1:11:35 PM	SENT

Associated Case Party: ALEXEJONES

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Associated Case Party: INFOWARS LLC

Name	BarNumber	Email	TimestampSubmitted	Status
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Associated Case Party: OWEN SHROYER

Name	BarNumber	Email	TimestampSubmitted	Status
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Associated Case Party: FREE SPEECH SYSTEMS LLC

Name	BarNumber	Email	TimestampSubmitted	Status
Jacquelyn W.Blott		jblott@jblottlaw.com	3/4/2022 1:11:35 PM	SENT

Case Contacts

Name
------

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Carmen Scott on behalf of Mark Bankston  
Bar No. 24071066  
carmen@fbtrial.com  
Envelope ID: 62311009  
Status as of 3/8/2022 10:23 AM CST

**Case Contacts**

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Norman Pattis		npattis@pattisandsmith.com	3/4/2022 1:11:35 PM	SENT